

KRONENBERGER ROSENFELD, LLP

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Attorneys for Defendants Omar Qazi
and Smick Enterprises, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AARON GREENSPAN,

Plaintiff,

v.

OMAR QAZI, et al.,

Defendants.

Case No. 3:20-cv-03426-JD

**DECLARATION OF KARL S.
KRONENBERGER ISO DEFENDANTS
OMAR QAZI AND SMICK ENTERPRISES,
INC.'S NOTICE OF MOTION AND
MOTION FOR ATTORNEY'S FEES;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT**

Time: 10:00 a.m.

Date: July 7, 2022

Before: The Hon. James Donato

Ctrm.: 11, 19th Floor

1 I, Karl S. Kronenberger, do hereby declare:

2 1. I am an attorney admitted to practice law in the State of California and before this
3 Court. I am a partner at the law firm of Kronenberger Rosenfeld, LLP, counsel of record for
4 Defendants Omar Qazi (“Qazi”) and Smick Enterprises, Inc. (collectively, the “Smick Defendants”)
5 in the above-captioned matter. Unless otherwise stated, I have personal knowledge of the facts set
6 forth in this declaration.

7 2. On or around May 20, 2020, Plaintiff Aaron Greenspan (“Greenspan”) filed his
8 complaint in this action. This document asserted five claims against the Smick Defendants.

9 3. Kronenberger Rosenfeld, LLP (“KR Law”) was engaged as counsel for Defendants
10 on or around July 12, 2020, and promptly began its defense in this suit.

11 4. Although this case resolved at the pleading stage, it nevertheless required significant
12 legal work to litigate. Plaintiff filed a total of five variations to his initial Complaint; of these, KR
13 Law prepared and filed motions to dismiss/strike as to four. Plaintiff also filed a number of other
14 motions that required responsive pleading, such as two motions for sanctions, one motion for an
15 order to show cause why KR Law and the Smick Defendants should not be held in contempt, an
16 “emergency” motion to preserve evidence, etc. As part of this work, our firm prepared numerous
17 declarations, conducted legal research, reviewed thousands of pages of filings submitted by
18 Greenspan to the Court, and fielded copious emails to and from Greenspan, including several in
19 which he either threatened to report me to the California bar or claimed that I had violated the ethical
20 rules in the course of my representation of the Smick Defendants in this case.

21 5. In total, KR Law has performed \$176,911.50 in legal services in defending this case.
22 Attached hereto as **Exhibit A** is a true and correct copy of a billing summary reflecting the work
23 KR Law performed in connection with Defendants’ legal expenses as sought by this motion (with
24 privileged and work product information redacted). Costs have been omitted, as the Smick
25 Defendants do not seek costs as part of the present motion.

26 6. Additional legal work still needs to be completed in this case, and legal expenses
27 will continue to accrue. At minimum, KR Law anticipates preparing a reply brief in support of this
28 motion, and opposing an anticipated motion for relief from judgment that Greenspan is expected to

1 file. Our firm's fees in preparing the motion for fees are not included in Exhibit A. We also anticipate
2 preparing a reply in support of this motion. KR Law will submit an updated accounting once these
3 expenses have been incurred.

4 7. As outlined below, Defendants' counsel have substantial experience in litigation
5 defense, intellectual property disputes, and internet law and, based on my experience, the hourly
6 rates and number of hours expended on this case have been reasonable and typical in the area for
7 similar work.

8 8. Specifically, KR Law is AV-rated and its attorneys are accomplished trial and
9 complex litigation attorneys. Martindale-Hubbell rates our firm as "AV Preeminent," which is the
10 highest rating available in the Martindale-Hubbell peer rating system. KR Law has a national
11 practice with 8 attorneys and 3 paralegals.

12 9. I dedicate my entire practice to legal issues relating to technology and the internet. I
13 am considered to be a leading voice regarding internet-related legal issues, and I have spoken as an
14 internet law expert on national television news programs and on industry panels throughout the
15 United States. I am also a co-founder of the Internet Law Leadership Summit (ILLS), a group of
16 85+ attorneys who practice in the area of internet and technology law, and I manage the educational
17 agendas for all ILLS conferences. I am a former prosecutor and Army JAG Corps officer.

18 10. Among the many types of cases I have litigated, I have represented clients in
19 numerous copyright cases, particularly those involving digital infringement and DMCA allegations.
20 I have also litigated a variety of internet trademark infringement, domain name, trade secret, and
21 defamation cases relating to internet matters in both state and federal courts.

22 11. I am a member of the State Bars of California, New York, Georgia, and Ohio and
23 have been admitted to numerous federal courts. I am a graduate of the University of Notre Dame
24 and the University of Cincinnati College of Law.

25 12. I served as the lead defense attorney in this matter and oversaw the work of the other
26 attorneys and professional staff at KR Law on this matter. In this matter, KR Law billed my time at
27 \$650 per hour, which was my standard hourly rate as of the time when KR Law became engaged in
28 this matter.

13. Jeffrey M. Rosenfeld is a named partner at KR Law. For nearly two decades, he has focused his legal practice on intellectual property litigation, speech litigation, and internet-related litigation. He has significant experience litigating online intellectual property disputes, particularly those based in copyright claims. Prior to joining KR Law, he was a litigation associate with Howard Rice Nemerovski Canady Falk & Rabkin, in San Francisco, and before that, a litigation and privacy associate with Covington & Burling in Washington, D.C. He received my J.D., *magna cum laude*, from the Georgetown University Law Center in 2002, where he was elected to the Order of the Coif and was an editor on the Georgetown Law Journal, and received my A.B. from Stanford University. He was the winner of the First Annual Stanford Technology Law Review paper competition for his paper, *Spiders and Crawlers and Bots, Oh My*, 2002 Stan. Tech. Law Rev. 3, and was recognized as a Northern California Rising Star in 2010–2014. In this matter, KR Law has billed his time at \$550 per hour.

14. Liana W. Chen is a partner in my office. Ms. Chen has considerable experience in civil litigation and, in particular, motion practice and copyright defense. Ms. Chen received her J.D., with high honors, from The George Washington University Law School in 2011, where she was elected to the Order of the Coif and was a member of *The George Washington Law Review*. She received her B.A., *summa cum laude*, from the University of California, San Diego in 2008. Prior to joining Kronenberger Rosenfeld, Ms. Chen was a litigation associate with Bryan Cave LLP in Washington, D.C. In this matter, Kronenberger Rosenfeld has billed Ms. Chen's time at \$415 per hour.

15. Katherine E. Hollist is a senior associate in my office, who works remotely from out of state. Ms. Hollist has focused her practice on internet and technology law, with an emphasis on complex civil litigation. She received her J.D., *summa cum laude*, from the University of Arizona James E. Rogers College of Law in 2016, where she was a writing fellow, an Arizona Law Review writer, and a member of the ABA moot court board and competition team. She has been published twice: once for an analysis of statutory interpretation frameworks (*A House Divided: Statutory Interpretation Problems Exemplified by Whitman I, Montgomery, and Whitman II*, 56 Ariz. L. Rev. 1227 (2014)), and once for her note, *Time to be grown-ups about video gaming: the rising eSports*

1 *industry and the need for regulation*, 57 Ariz. L. Rev. 823 (2015). This publication has garnered
2 over 130 citations by subsequent scholars. Ms. Hollist has been invited to speak on video game and
3 esports law in various venues across the country. Prior to joining KR Law, Ms. Hollist was a
4 litigation associate at Gallagher & Kennedy P.A. in Phoenix, Arizona. KR Law billed her time for
5 this matter at \$395 to \$435 per hour.

6 16. Also when possible, KR Law used a paralegal to perform work in preparing and
7 finalizing filings and other briefings. Leah Vulić was a senior paralegal at KR Law, who was
8 admitted as an attorney last month. Leah has many years of paralegal experience in civil litigation
9 practice and is well-versed in all aspects of pretrial and trial practice, including case management,
10 document review, court filings, and legal research. Leah graduated magna cum laude from the Ohio
11 State University in March 2006, where she earned a B.A. in History. Leah obtained a Certificate of
12 Paralegal Studies from Kaplan University in October 2008. From 2008 through 2011, Leah served
13 as a legal assistant at Onda, LaBuhn, Rankin & Boggs Co., LPA in Columbus, Ohio. Leah joined
14 KR Law as a senior paralegal in 2011, where she has worked on all aspects of the firm's civil
15 litigation practice. Additionally, paralegal Iyah Turminini assisted in the preparation of certain
16 filings in this case. Iyah received her dual B.A. from the University of California at Berkeley in
17 2014. Iyah has been working as a paralegal for over three years and is well-versed in all aspects of
18 civil procedure. Further, paralegal Jasper Eagleton also assisted in performing work related to this
19 case. Jasper has 11 years of experience as a paralegal, including over four years of experience in
20 civil litigation. Jasper graduated from Texas State University – San Marcos in 2009, and in 2015
21 obtained a paralegal certificate through the Center for Advanced Legal Studies. Further, Jasper has
22 the Certified Paralegal credential through the National Association of Legal Assistants. Jasper
23 joined KR Law as a paralegal in 2021. In this matter, KR Law billed paralegal time at \$205-\$295
24 per hour.

25 17. KR Law generates billing summaries on a regular basis, which include billing times
26 and work descriptions. My colleagues and I adhered to KR Law's billing procedures in tracking and
27 entering our time billed for this case. Exhibit A is a true and correct copy of a billing summary
28 reflecting the work KR Law performed in connection with Defendants' legal expenses (with

1 privileged and work product information redacted).

2 I declare under penalty perjury under the laws of the United States of America that the
3 foregoing is true and correct.

4
5 Dated: June 2, 2022

By: Karl S. Kronenberger
Karl S. Kronenberger

Exhibit A

Billing Summary for Greenspan v. Qazi, et al., Case No. 20-cv-03426-JD (N.D. Cal.)

| Date | Time | Description | Rate (\$) | Billable (\$) | Timekeeper |
|-----------|------|---|-----------|---------------|-------------------|
| 7/8/2020 | 0.95 | Initial phone call with client re [REDACTED]. | \$ 650.00 | \$ 617.50 | Karl Kronenberger |
| 7/11/2020 | 1.75 | Conference with client [REDACTED]. | \$ 650.00 | \$ 1,137.50 | Karl Kronenberger |
| 7/12/2020 | 1.1 | Review docket and initial pleadings; research re: motion to set aside default and re: amended pleading; internal correspondence re: same. | \$ 415.00 | \$ 456.50 | Liana Chen |
| 7/13/2020 | 1.65 | Review background documents; internal conference re: same. | \$ 530.00 | \$ 874.50 | Jeff Rosenfeld |
| 7/13/2020 | 1 | Process and route filed documents into document management system; internal conference with attorneys re: motion to lift default; update calendar re: filing of complaint, initial case management conference, and related deadlines. | \$ 205.00 | \$ 205.00 | Leah Vulic |
| 7/13/2020 | 0.2 | Internal conference re: lifting default and next steps; draft correspondence to plaintiff re: same; review additional pleadings. | \$ 415.00 | \$ 83.00 | Liana Chen |
| 7/14/2020 | 0.05 | Internal conference with attorneys re: status and strategy. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 7/14/2020 | 2.5 | Review plaintiff's email re: default. | \$ 205.00 | \$ 512.50 | Leah Vulic |
| 7/14/2020 | 0.85 | Research defenses to claims; continue to review same; draft motion to lift default; review correspondence with plaintiff re: same. | \$ 415.00 | \$ 352.75 | Liana Chen |
| 7/15/2020 | 1.05 | Internal conference re: initial filings; review internal correspondence and correspondence with client; review notices of appearance and certificate of interested parties and finalize. | \$ 205.00 | \$ 215.25 | Iyah Turminini |
| 7/15/2020 | 1.35 | Internal conferences re: case status and strategy; review and revise motion to lift default and supporting documents; internal communications re: same. | \$ 530.00 | \$ 715.50 | Jeff Rosenfeld |
| 7/15/2020 | 1.95 | Review and edit motion to lift default; internal conference re: [REDACTED] further internal conference re: motion to lift default. | \$ 650.00 | \$ 1,267.50 | Karl Kronenberger |
| 7/15/2020 | 0.65 | Draft notice of motion and motion to lift default and declaration in support thereof; internal conference with attorneys re: same. | \$ 205.00 | \$ 133.25 | Leah Vulic |
| 7/15/2020 | 0.15 | Review and revise motion to lift default and supporting documents; internal conference re: [REDACTED] | \$ 415.00 | \$ 62.25 | Liana Chen |
| 7/16/2020 | 1.55 | Review and revise attorney declaration and motion to lift default; internal communications re: same; review correspondence from plaintiff. | \$ 530.00 | \$ 821.50 | Jeff Rosenfeld |
| 7/16/2020 | 0.1 | Draft attorney declaration in support of motion to lift default; revise, finalize, and electronically file motion to lift default, supporting declarations, and proposed order; email Word version of proposed order to Court; update calendar re filing of motion and hearing. | \$ 205.00 | \$ 20.50 | Leah Vulic |
| 7/16/2020 | 0.05 | Internal correspondence re: motion to lift default; review correspondence with opposing party re: DMCA issues. | \$ 415.00 | \$ 20.75 | Liana Chen |
| 7/17/2020 | 0.05 | Internal conference re: DMCA notices; review correspondence with opposing party re: same. | \$ 415.00 | \$ 20.75 | Liana Chen |
| 7/21/2020 | 1 | Internal conference re: opposition to request for default on amended complaint. | \$ 530.00 | \$ 530.00 | Jeff Rosenfeld |

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|-----------|------|---|-----------|-------------|-------------------|--|
| | | Process and route plaintiff's request for entry of default on first amended complaint, declaration, and reply and declaration into document management system; draft, finalize, and electronically file opposition to same; internal conference with attorneys re accepting | | | | |
| 7/21/2020 | 0.65 | service and time to respond. Review plaintiff's motion for default on amended complaint; draft opposition for same; review correspondence with plaintiff re: service; | \$ 205.00 | \$ 133.25 | Leah Vulic | |
| 7/21/2020 | 0.3 | internal conference re: same. Correspond with plaintiff re: scheduling and further research re: first | \$ 415.00 | \$ 124.50 | Liana Chen | |
| 7/22/2020 | 0.25 | amended complaint. Internal conference with attorney re: service of complaint, deadline to | \$ 650.00 | \$ 162.50 | Karl Kronenberger | |
| 7/22/2020 | 4.5 | respond, motion to dismiss. | \$ 205.00 | \$ 922.50 | Leah Vulic | |
| | | Conference with defense counsel re: next steps (vm); internal conference re: motion to dismiss; research and start to draft same; correspond with plaintiff re: certificate of interested entities; review correspondence with plaintiff re: extension and meet-and-confer; | | | | |
| 7/22/2020 | 1.9 | review amended complaint further. | \$ 415.00 | \$ 788.50 | Liana Chen | |
| | | Internal conference re: case strategy; draft notice of motion and motion to dismiss; internal conference re: administrative motion; review local rules re: administrative motion to extend time to respond; draft proposed order and declarations of O. Qazi and K. | | | | |
| 7/23/2020 | 1.4 | Kronenberger in support of motion to dismiss. Internal conference re: case status and strategy; review exhibits to | \$ 205.00 | \$ 287.00 | Iyah Turminini | |
| 7/23/2020 | 0.5 | operative complaint. | \$ 530.00 | \$ 265.00 | Jeff Rosenfeld | |
| 7/23/2020 | 2.2 | Internal conference re: case strategy and anti-SLAPP. | \$ 650.00 | \$ 1,430.00 | Karl Kronenberger | |
| 7/23/2020 | 1 | Conference with client re: [REDACTED]. Internal conferences with attorneys re: strategy re: motion to dismiss and anti-SLAPP, certificate of interested parties, administrative | \$ 650.00 | \$ 650.00 | Karl Kronenberger | |
| 7/23/2020 | 4.3 | motion to clarify/extend. Continue to research and draft motion to dismiss; internal conference re: same; review plaintiff's correspondence re: stipulation and interested entities; review amended complaint exhibits for same; draft admin motion re: extension and page limits; review plaintiff's request for judicial notice for default; internal correspondence re: | \$ 205.00 | \$ 881.50 | Leah Vulic | |
| 7/23/2020 | 0.55 | same. | \$ 415.00 | \$ 228.25 | Liana Chen | |
| 7/24/2020 | 1 | Internal conference re: phone call with client; review emails re: same and from plaintiff; draft amended certificate of interested parties. Review summary of call with client; review administrative motion for extension and clarification re: responding to amended complaint; draft declaration and proposed order for same; internal conference | \$ 205.00 | \$ 205.00 | Iyah Turminini | |
| 7/24/2020 | 0.6 | re: same. Process and route plaintiff's request for judicial notice into document management system; internal conferences with attorneys re: same, plaintiff's demands to withdraw filing, and administrative motion to | \$ 530.00 | \$ 318.00 | Jeff Rosenfeld | |
| 7/24/2020 | 4.45 | clarify/extend. | \$ 205.00 | \$ 912.25 | Leah Vulic | |
| | | Continue to research and draft motion to dismiss; review and revise administrative motion re: same; internal conference re: same; correspond with client re: [REDACTED]; draft stipulation re: page limits for | | | | |
| 7/24/2020 | 1.6 | same; correspond with plaintiff re: discovery conference. | \$ 415.00 | \$ 664.00 | Liana Chen | |
| 7/25/2020 | 3.1 | Continue to research and draft motion to dismiss. | \$ 415.00 | \$ 1,286.50 | Liana Chen | |
| 7/26/2020 | 0.15 | Continue to research and draft motion to dismiss. Internal conference re: case strategy and deadlines; update amended | \$ 415.00 | \$ 62.25 | Liana Chen | |
| 7/27/2020 | 0.35 | certificate of interested parties. | \$ 205.00 | \$ 71.75 | Iyah Turminini | |

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|-----------|------|--|-----------|-----------|-------------------|
| 7/27/2020 | 0.65 | Conference with co-defense counsel re: case status and strategy; briefly review Rule 11 motion; internal communications re: same. | \$ 530.00 | \$ 344.50 | Jeff Rosenfeld |
| 7/27/2020 | 0.45 | Internal conference with attorneys re: amending certificate of interested parties, case management; process and route plaintiff's discovery requests and motion for sanctions into document management system; update calendar re: same; internal conference with attorneys re: same. | \$ 205.00 | \$ 92.25 | Leah Vulic |
| 7/27/2020 | 0.7 | Review and revise stipulation for admin motion; internal conference re: same; draft correspondence to plaintiff re: same; review briefly plaintiff's motion for sanctions; internal correspondence re: amended certificate of interested entities and defamatory statements. | \$ 415.00 | \$ 290.50 | Liana Chen |
| 7/28/2020 | 1.3 | Final review of administrative motion to clarify hearing dates and case status; internal conference and communications re: same; conference with co-defense counsel re: Rule 26(f) conference; internal communications re: same; research re: same. | \$ 530.00 | \$ 689.00 | Jeff Rosenfeld |
| 7/28/2020 | 0.4 | Revise, finalize, and electronically file administrative motion to clarify and extend, declaration in support thereof, and proposed order; email Word version of proposed order to court; update calendar re: filing of administrative motion; revise, finalize, and electronically file amended certificate of interested persons. | \$ 205.00 | \$ 82.00 | Leah Vulic |
| 7/28/2020 | 0.45 | Review and revise administrative motion re: responsive pleading; internal conference re: same; internal correspondence re: discovery stay issues; brief research re: same. | \$ 415.00 | \$ 186.75 | Liana Chen |
| 7/29/2020 | 0.45 | Conference with client re: [REDACTED]. | \$ 530.00 | \$ 238.50 | Jeff Rosenfeld |
| 7/29/2020 | 0.25 | Conference with client regarding [REDACTED]. | \$ 650.00 | \$ 162.50 | Karl Kronenberger |
| 7/29/2020 | 0.1 | Review emails re: ADR and case management; update calendar re: deadline to respond to discovery requests. | \$ 205.00 | \$ 20.50 | Leah Vulic |
| 7/29/2020 | 0.6 | Correspond with plaintiff and defense counsel re: Rule 26 and discovery issues. | \$ 415.00 | \$ 249.00 | Liana Chen |
| 7/30/2020 | 0.5 | Internal conference re: ADR certification; draft ADR certification; file with court using ECF system; process and route file stamped copy into internal document management system. | \$ 205.00 | \$ 102.50 | Iyah Turminini |
| 7/30/2020 | 0.1 | Conference with Tesla counsel and Aaron Greenspan re: ADR certification. | \$ 650.00 | \$ 65.00 | Karl Kronenberger |
| 7/30/2020 | 0.1 | Process and route plaintiff's ADR certification into document management system. | \$ 205.00 | \$ 20.50 | Leah Vulic |
| 7/30/2020 | 0.85 | Review correspondence with plaintiff and defense counsel re: discovery stay and ADR; review client background re: Twitter accounts. | \$ 415.00 | \$ 352.75 | Liana Chen |
| 7/31/2020 | 0.8 | Conference with opposing counsel re: anticipated anti-SLAPP motion and settlement; internal conference re: same. | \$ 530.00 | \$ 424.00 | Jeff Rosenfeld |
| 7/31/2020 | 0.5 | Conference with Aaron Greenspan re: anti-SLAPP motion and settlement. | \$ 650.00 | \$ 325.00 | Karl Kronenberger |
| 7/31/2020 | 1.75 | Process and route plaintiff's opposition to defendants' motion to lift default and supporting documents and plaintiff's partial opposition to administrative motion re: first amended complaint into document management system; process and route Tesla defendants' motion to dismiss and supporting documents into document management system; update calendar re: service and filing of and hearing on motion to dismiss. | \$ 205.00 | \$ 358.75 | Leah Vulic |

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|-----------|------|---|-----------|-------------|-------------------|--|
| | | Review Tesla motion to dismiss and supporting documents; review and revise motion to dismiss and supporting papers; review plaintiff's opposition to motion to lift default; draft reply re: same; review plaintiff's opposition to administrative motion; review | | | | |
| 7/31/2020 | 0.35 | correspondence re: stay during securities motion. | \$ 415.00 | \$ 145.25 | Liana Chen | |
| | | Review correspondence with plaintiff re: evidence preservation; | | | | |
| 8/2/2020 | 1.1 | review and revise motion to dismiss. | \$ 415.00 | \$ 456.50 | Liana Chen | |
| | | Review and edit reply to motion to lift default; review and edit motion | | | | |
| 8/3/2020 | 0.4 | to dismiss and anti-SLAPP motion. | \$ 650.00 | \$ 260.00 | Karl Kronenberger | |
| | | Review and revise motion to dismiss; internal correspondence re: | | | | |
| 8/3/2020 | 0.15 | same. | \$ 415.00 | \$ 62.25 | Liana Chen | |
| 8/4/2020 | 1.05 | Review and revise reply to motion to lift stay. | \$ 530.00 | \$ 556.50 | Jeff Rosenfeld | |
| 8/4/2020 | 0.3 | Conference with client re: [REDACTED]. | \$ 650.00 | \$ 195.00 | Karl Kronenberger | |
| | | Process and route plaintiff's emergency motion for clarification of PSLRA and to lift stay into document management system; internal | | | | |
| 8/4/2020 | 0.3 | conference with attorneys re: same. | \$ 205.00 | \$ 61.50 | Leah Vulic | |
| | | Review plaintiff's motion re: lifting discovery stay; internal conference | | | | |
| 8/4/2020 | 0.35 | re same; internal correspondence re: motion to dismiss. | \$ 415.00 | \$ 145.25 | Liana Chen | |
| | | Revise, finalize, and electronically file reply in support of motion to lift | | | | |
| | | default; update calendar re: deadlines re: Tesla defendants' motion to | | | | |
| 8/5/2020 | 0.05 | dismiss. | \$ 205.00 | \$ 10.25 | Leah Vulic | |
| | | Internal conference re: preservation notice; review plaintiff's | | | | |
| 8/5/2020 | 0.1 | correspondence re: scheduling order. | \$ 415.00 | \$ 41.50 | Liana Chen | |
| | | Process and route order denying motion to lift discovery stay into | | | | |
| 8/7/2020 | 0.7 | document management system. | \$ 205.00 | \$ 143.50 | Leah Vulic | |
| | | Internal conference re: defamatory statements; review First Amended | | | | |
| 8/11/2020 | 0.1 | Complaint to locate defamatory statements. | \$ 205.00 | \$ 20.50 | Iyah Turminini | |
| 8/11/2020 | 1.85 | Internal conference with attorneys re: motion to dismiss. | \$ 205.00 | \$ 379.25 | Leah Vulic | |
| 8/12/2020 | 0.25 | Review and revise draft motion to dismiss. | \$ 530.00 | \$ 132.50 | Jeff Rosenfeld | |
| | | | | | | |
| 8/12/2020 | 0.6 | Internal conference re: motion to dismiss and anti-SLAPP motion. | \$ 650.00 | \$ 390.00 | Karl Kronenberger | |
| | | Internal conference with attorneys re: status of matters, motion to | | | | |
| | | dismiss, and anti-SLAPP; process and route plaintiff's declaration in | | | | |
| | | support of motion for sanctions into document management system; | | | | |
| | | process and route order re: motion to lift default and vacating hearing | | | | |
| | | and case management conference into document management | | | | |
| 8/12/2020 | 0.25 | system; update calendar re: same. | \$ 205.00 | \$ 51.25 | Leah Vulic | |
| 8/12/2020 | 0.85 | Internal conference re: anti-slapp motion and strategy. | \$ 415.00 | \$ 352.75 | Liana Chen | |
| | | Review Rule 11 motion for sanctions; summarize same; draft email to | | | | |
| 8/12/2020 | 4.5 | plaintiff re: same; internal correspondence re: same. | \$ 415.00 | \$ 1,867.50 | Liana Chen | |
| | | Continue reviewing and revising combined motion to dismiss and anti- | | | | |
| 8/13/2020 | 1.1 | SLAPP motion. | \$ 530.00 | \$ 583.00 | Jeff Rosenfeld | |
| | | Research re: anti-slapp motion prong one; draft summary re: same; | | | | |
| 8/13/2020 | 3.6 | review media re: plaintiff for same. | \$ 415.00 | \$ 1,494.00 | Liana Chen | |
| | | Continue researching, drafting, and revising combined motion to | | | | |
| 8/14/2020 | 0.45 | dismiss and anti-SLAPP motion; internal communications re: same. | \$ 530.00 | \$ 238.50 | Jeff Rosenfeld | |
| | | Process and route news articles and other publications for motion to | | | | |
| 8/14/2020 | 0.45 | dismiss into document management system. | \$ 205.00 | \$ 92.25 | Leah Vulic | |
| | | Internal conference re: anti-slapp motion; review and summarize | | | | |
| 8/14/2020 | 0.75 | additional background for same. | \$ 415.00 | \$ 311.25 | Liana Chen | |

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|-----------|---|---|-----------|-------------|-------------------|
| 8/17/2020 | Internal conference re: declaration of K. Kronenberger and authentication of articles to be used as exhibits to motion to dismiss; | | \$ 205.00 | \$ 82.00 | Iyah Turminini |
| | 0.4 | begin review of declaration. | | | |
| 8/17/2020 | Review and gather exhibits in support of combined anti-SLAPP motion and motion to dismiss; internal conference re: same; review and | | \$ 530.00 | \$ 556.50 | Jeff Rosenfeld |
| | 1.05 | revise motion to dismiss. | | | |
| 8/17/2020 | 0.15 | Review and edit motion to dismiss and motion to strike. | \$ 650.00 | \$ 97.50 | Karl Kronenberger |
| 8/17/2020 | 0.15 | Internal conference with attorneys re: motion to dismiss. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 8/17/2020 | Internal conference re: motion to dismiss; correspond with client re: [REDACTED]. | | \$ 415.00 | \$ 3,693.50 | Liana Chen |
| | 8.9 | | | | |
| 8/18/2020 | Internal conference re: articles for exhibits to declaration of Karl S. Kronenberger; review articles; draft exhibit language; review motion; updated declaration; internal conference re: same; finalize proposed | | \$ 205.00 | \$ 184.50 | Iyah Turminini |
| | 0.9 | order; finalize and combine declaration exhibits; assist with filing. | | | |
| 8/18/2020 | Further review and revise motion to dismiss; review supporting | | \$ 530.00 | \$ 344.50 | Jeff Rosenfeld |
| | 0.65 | declaration and exhibits; internal communications re: same. | | | |
| 8/18/2020 | 5.65 | Review and edit declaration in support of motion to dismiss. | \$ 650.00 | \$ 3,672.50 | Karl Kronenberger |
| 8/18/2020 | Review and verify case citations; multiple internal conference with attorneys re: same and filing of motion to strike/dismiss; draft table of authorities; revise and finalize motion to dismiss' update calendar re: filing, service, and hearing on motion to dismiss/anti-SLAPP' email | | \$ 205.00 | \$ 235.75 | Leah Vulic |
| | 1.15 | Word version of proposed order to court. | | | |
| 8/18/2020 | Review and revise motion to dismiss and supporting documents; | | \$ 415.00 | \$ 166.00 | Liana Chen |
| | 0.4 | internal conference re: same; oversee and review filing of same. | | | |
| 8/20/2020 | Email communications with attorneys re: plaintiff's motion for sanctions; process and route same into document management | | \$ 205.00 | \$ 676.50 | Leah Vulic |
| | 3.3 | system; update calendar re: filing of motion and hearing. | | | |
| 8/20/2020 | Review plaintiff's motion for sanctions; research and draft opposition | | \$ 415.00 | \$ 186.75 | Liana Chen |
| | 0.45 | for same. | | | |
| 8/21/2020 | 0.1 | Draft preservation letter to Greenspan and his family. | \$ 650.00 | \$ 65.00 | Karl Kronenberger |
| 8/21/2020 | 0.8 | Internal conference with attorney re: preservation letter. | \$ 205.00 | \$ 164.00 | Leah Vulic |
| 8/21/2020 | Continue to research and draft opposition to motion for sanctions; | | \$ 415.00 | \$ 186.75 | Liana Chen |
| | 0.45 | internal correspondence re: same. | | | |
| 8/24/2020 | Conference with client re: [REDACTED]. | | \$ 650.00 | \$ 1,267.50 | Karl Kronenberger |
| | 1.95 | Conference with counsel for Tesla re: amended complaint; internal conference re: same; review proposed amended complaint and email client re: [REDACTED] | | | |
| 8/24/2020 | [REDACTED]. | | \$ 650.00 | \$ 130.00 | Karl Kronenberger |
| | 0.2 | Review email responses received from client re: [REDACTED]; notes re: same for reference in drafting | | | |
| 8/24/2020 | response | | \$ 395.00 | \$ 138.25 | Kate Hollist |
| | 0.35 | Process and route plaintiff's opposition to Tesla defendants' motion to dismiss and request for judicial notice into document management system; internal conference with attorneys re: plaintiff's conduct and | | | |
| 8/24/2020 | vexatious litigant status. | | \$ 205.00 | \$ 194.75 | Leah Vulic |
| | 0.95 | Conference with defense counsel re: amended complaint and next steps; review same; draft summary of changes; internal correspondence re: same; review correspondence with client re: | | | |
| 8/24/2020 | 0.7 | [REDACTED]. | \$ 415.00 | \$ 290.50 | Liana Chen |
| 8/25/2020 | 0.25 | Conference with A. Greenspan re: settlement. | \$ 650.00 | \$ 162.50 | Karl Kronenberger |
| 8/25/2020 | 0.35 | Conference with counsel for Tesla re: stipulated amended complaint. | \$ 650.00 | \$ 227.50 | Karl Kronenberger |

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|-----------|--|-----------|-------------|-------------------|
| 8/25/2020 | Draft template opposition to plaintiff's motion for sanctions and 0.4 declaration in support thereof. | \$ 205.00 | \$ 82.00 | Leah Vulic |
| 8/25/2020 | Review and revise client declaration for motion for sanctions; internal conference re: stipulation re: amended complaint; review 0.15 correspondence with counsel and plaintiff re: same. | \$ 415.00 | \$ 62.25 | Liana Chen |
| 8/26/2020 | Review draft stipulation re: amended complaint and internal 0.25 conference re: same. | \$ 650.00 | \$ 162.50 | Karl Kronenberger |
| 8/26/2020 | Review correspondence with counsel re: amended complaint; review correspondence with plaintiff re: Twitter account; review admin motion and papers for filing amended complaint and briefing 1.1 schedule; internal correspondence re: same. | \$ 415.00 | \$ 456.50 | Liana Chen |
| 8/27/2020 | Internal conference re: second amended complaint; process and route second amended complaint and corresponding exhibits into internal document management system; begin review and 0.3 comparison of exhibits and prior version of complaint. | \$ 205.00 | \$ 61.50 | Iyah Turminini |
| 8/27/2020 | Process and route joint administrative motion re: page limits and briefing schedule into document management system; internal 0.9 conference re: second amended complaint. | \$ 205.00 | \$ 184.50 | Leah Vulic |
| 8/28/2020 | Cite check existing citations in response to motion for sanctions for accuracy; shepherdize case law and check for additional supportive 0.1 authority | \$ 395.00 | \$ 39.50 | Kate Hollist |
| 8/28/2020 | 1.4 Review and revise opposition to motion for sanctions. | \$ 415.00 | \$ 581.00 | Liana Chen |
| 8/31/2020 | Internal conference re: comparison and review of changes to Second Amended Complaint; format and prepare comparison document; review briefly; internal conference re: same; draft exhibit comparison document and format first amended complaint and second amended complaint for ease of navigation and comparison; review and 1.8 compare exhibits. | \$ 205.00 | \$ 369.00 | Iyah Turminini |
| 8/31/2020 | Research re: instances where party defending against motion for sanctions was awarded fees and test for reasonable inquiry/frivolousness; revise response to motion to sanctions to 0.1 include additional research | \$ 395.00 | \$ 39.50 | Kate Hollist |
| 8/31/2020 | Email communications with attorneys re: opposition to motion for 1.4 sanctions. | \$ 205.00 | \$ 287.00 | Leah Vulic |
| 8/31/2020 | Draft attorney declaration re: opposition to motion for default; review and revise opposition; review briefly redline for second amended 0.8 complaint; start to update motion to dismiss same. | \$ 415.00 | \$ 332.00 | Liana Chen |
| 9/1/2020 | Internal conference re: opposition to motion for sanctions; format 0.6 opposition. | \$ 205.00 | \$ 123.00 | Iyah Turminini |
| 9/1/2020 | Review opposition to motion for sanctions; review redline of second 1.35 amended complaint. | \$ 530.00 | \$ 715.50 | Jeff Rosenfeld |
| 9/1/2020 | Review and edit opposition to Rule 11 motion and supporting 3.6 declarations. | \$ 650.00 | \$ 2,340.00 | Karl Kronenberger |
| 9/1/2020 | Draft additional legal arguments to response to motion for sanctions, including request for sanctions against Plaintiff. Review and revise 1.4 motion for filing. | \$ 395.00 | \$ 553.00 | Kate Hollist |
| 9/1/2020 | Internal conference re: motion for sanctions and motion to dismiss; review and revise opposition for motion for sanctions; continue to 2.9 draft motion to dismiss and review amended complaint for same. | \$ 415.00 | \$ 1,203.50 | Liana Chen |

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|-----------|------|---|-----------|-------------|-------------------|
| | | Internal conference re: opposition to motion for sanctions; begin review of opposition; internal conference re: court's docket entry re: civility; further, review, and finalize opposition; internal conference re: declaration of K. Kronenberger; review local rules and judge's standing orders; finalize declarations of K. Kronenberger and O. Qazi for filing; file opposition and supporting documents; process and route file-stamped copies of documents into internal document | | | |
| 9/2/2020 | 0.55 | management system. | \$ 205.00 | \$ 112.75 | Iyah Turminini |
| | | Internal conference re: case status and strategy; review order lifting | | | |
| 9/2/2020 | 0.35 | default. | \$ 530.00 | \$ 185.50 | Jeff Rosenfeld |
| | | Review and edit Rule 11 motion opposition; internal conference re: | | | |
| 9/2/2020 | 0.3 | same; call with client re: [REDACTED]. | \$ 650.00 | \$ 195.00 | Karl Kronenberger |
| 9/2/2020 | 0.25 | Conference with Aaron Greenspan re: Rule 11 motion. | \$ 650.00 | \$ 162.50 | Karl Kronenberger |
| 9/2/2020 | 2.8 | Internal conference re: anti-SLAPP motion and motion to dismiss. | \$ 650.00 | \$ 1,820.00 | Karl Kronenberger |
| | | Internal conference re: response to motion for sanctions and revisions to motion re: same; read Court's order with reference to civility; internal conference re: strategy for filing in light of order; emails with | | | |
| 9/2/2020 | 1.6 | Plaintiff re: withdrawal of Rule 11 motion | \$ 395.00 | \$ 632.00 | Kate Hollist |
| | | Internal conference re: motion to dismiss and begin research re: civil | | | |
| 9/2/2020 | 1.9 | anti-stalking claim | \$ 395.00 | \$ 750.50 | Kate Hollist |
| | | Process and route order re: second amended complaint and response deadlines into document management system; update calendar re: same; process and route signed client declaration in support of opposition to motion for sanctions into document management system; review and revise opposition to motion for sanctions; process and route order on default and civility into document management system; review same; internal conferences with attorney re: same and | | | |
| 9/2/2020 | 1.3 | anti-SLAPP motion. | \$ 205.00 | \$ 266.50 | Leah Vulic |
| | | Review and revise opposition to motion for sanctions; internal conference re: same; review and revise motion to dismiss amended complaint; internal conference re: same; review court order re: | | | |
| 9/2/2020 | 0.6 | default and civility; review correspondence with plaintiff re: same. | \$ 415.00 | \$ 249.00 | Liana Chen |
| 9/8/2020 | 1.55 | Conference with client re: [REDACTED] | \$ 650.00 | \$ 1,007.50 | Karl Kronenberger |
| | | Conference with Aaron Greenspan re: settlement; conference with client re: [REDACTED]; draft respond | | | |
| 9/8/2020 | 0.1 | to settlement proposal. | \$ 650.00 | \$ 65.00 | Karl Kronenberger |
| 9/8/2020 | 0.1 | Review correspondence received from Plaintiff | \$ 395.00 | \$ 39.50 | Kate Hollist |
| | | Internal conference re: settlement; review background for motion to | | | |
| 9/8/2020 | 0.85 | dismiss. | \$ 415.00 | \$ 352.75 | Liana Chen |
| | | Internal conference re: notice of withdrawal by plaintiff; review notice of withdrawal; review calendar and upcoming case deadlines; process and route file-stamped documents into internal document | | | |
| 9/9/2020 | 0.2 | management system. | \$ 205.00 | \$ 41.00 | Iyah Turminini |
| | | Correspond with Aaron Greenspan re: settlement; phone call with | | | |
| 9/9/2020 | 0.05 | client re: [REDACTED]. | \$ 650.00 | \$ 32.50 | Karl Kronenberger |
| | | Process and route plaintiff's notice of withdrawal of motion for | | | |
| 9/10/2020 | 2.05 | sanctions into document management system. | \$ 205.00 | \$ 420.25 | Leah Vulic |
| | | Begin reviewing amended complaint in preparation for anti-SLAPP | | | |
| 9/14/2020 | 2.2 | motion and motion to dismiss; begin researching same. | \$ 530.00 | \$ 1,166.00 | Jeff Rosenfeld |
| | | Begin reviewing and revising combined motion to dismiss second | | | |
| 9/15/2020 | 2.7 | amended complaint and anti-SLAPP motion. | \$ 530.00 | \$ 1,431.00 | Jeff Rosenfeld |

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| 9/15/2020 | Research re: DMCA misrepresentation; begin reviewing Complaint to 3.2 analyze for factual allegations in support of DMCA and stalking claims | \$ 395.00 | \$ 1,264.00 | Kate Hollist |
| 9/16/2020 | Continue researching and drafting motion to dismiss first amended 0.55 complaint. | \$ 530.00 | \$ 291.50 | Jeff Rosenfeld |
| 9/17/2020 | 2.05 Continue researching, drafting, and revising motion to dismiss. Continue researching and drafting motion to dismiss and anti-SLAPP motion; conference with counsel for Tesla/Musk re: motion to dismiss | \$ 530.00 | \$ 1,086.50 | Jeff Rosenfeld |
| 9/18/2020 | 0.4 briefing. | \$ 530.00 | \$ 212.00 | Jeff Rosenfeld |
| 9/18/2020 | 0.8 Conference with opposing counsel re: motion briefing. Conference with opposing counsel re: Tesla's anticipated arguments | \$ 650.00 | \$ 520.00 | Karl Kronenberger |
| 9/18/2020 | 1.05 in its motion; continue review of Complaint Internal conference re: Greenspan's emails to Tesla board; review exhibits to Second Amended Complaint for defamatory statements | \$ 395.00 | \$ 414.75 | Kate Hollist |
| 9/23/2020 | 0.05 about O. Qazi. | \$ 205.00 | \$ 10.25 | Iyah Turminini |
| 9/23/2020 | 0.95 Internal communications re: second amended complaint. Conference with client re: [REDACTED] | \$ 530.00 | \$ 503.50 | Jeff Rosenfeld |
| 9/23/2020 | 0.35 [REDACTED]. Review Greenspan correspondence with Tesla board re: statute of | \$ 650.00 | \$ 227.50 | Karl Kronenberger |
| 9/23/2020 | 1.2 limitation analysis. | \$ 650.00 | \$ 780.00 | Karl Kronenberger |
| 9/23/2020 | Finish review of Complaint to confirm lack of factual allegations to support Plaintiff's claims; finalize motion to dismiss with arguments 1.95 re: civil stalking and DMCA misrepresentation claims | \$ 395.00 | \$ 770.25 | Kate Hollist |
| 9/24/2020 | Continue reviewing and revising combined anti-SLAPP motion and motion to dismiss and supporting documents; internal 2.2 communications re: same. | \$ 530.00 | \$ 1,166.00 | Jeff Rosenfeld |
| 9/24/2020 | Draft proposed order; internal conference with attorneys re: hearing 3.65 date. | \$ 205.00 | \$ 748.25 | Leah Vulic |
| 9/25/2020 | Internal conference re: motion to dismiss; review declaration of K. Kronenberger in support of motion to dismiss; compile and format exhibits to declaration; internal conference re: hearing date; finalize declaration of K. Kronenberger; review motion to dismiss and proposed order; update declaration citations; assist with filing of 0.2 motion. | \$ 205.00 | \$ 41.00 | Iyah Turminini |
| 9/25/2020 | Assist in finalizing and filing combined anti-SLAPP motion and motion 0.75 to dismiss; internal communications and conferences re: same. | \$ 530.00 | \$ 397.50 | Jeff Rosenfeld |
| 9/25/2020 | 0.2 Review and edit motion to dismiss and anti-SLAPP motion. | \$ 650.00 | \$ 130.00 | Karl Kronenberger |
| 9/25/2020 | 2.05 Review correspondence received from Plaintiff | \$ 395.00 | \$ 809.75 | Kate Hollist |
| 9/25/2020 | Continue reviewing and revising memorandum of points and authorities in support of motion to strike/dismiss; draft tables of contents and authorities; revise, finalize, and electronically file motion to strike and dismiss, declaration in support thereof, and proposed order; multiple internal conferences with attorneys re: same; dispatch Word version of proposed order to court; update calendar re: filing 0.75 and service of motion and hearing. | \$ 205.00 | \$ 153.75 | Leah Vulic |
| 9/28/2020 | Internal conference re: case deadlines and filings; briefly review Tesla 0.45 defendants' and Plaintiff Greenspan's filings re: motion to dismiss. | \$ 205.00 | \$ 92.25 | Iyah Turminini |
| 9/28/2020 | 0.85 Conference with Shafat Quazi re: settlement. | \$ 650.00 | \$ 552.50 | Karl Kronenberger |

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| | Process and route Tesla defendant's motion to dismiss and supporting documents into document management system; process and route plaintiff's motion for order to show cause and supporting documents into document management system; review same; update calendar | | | | |
| 9/28/2020 | 1.4 re: filing of motion and hearing. | \$ 205.00 | \$ 287.00 | Leah Vulic | |
| | Review Plaintiff's motion for OSC; internal conference re: same; begin | | | | |
| 9/29/2020 | 0.1 outlining legal arguments for response; research re: same | \$ 395.00 | \$ 39.50 | Kate Hollist | |
| 9/29/2020 | 0.8 Internal conference with attorneys re: order to show cause. | \$ 205.00 | \$ 164.00 | Leah Vulic | |
| | Review email correspondence with Plaintiff and allegations for factual | | | | |
| 9/30/2020 | 0.1 inaccuracies in representations to Court in Plaintiff's motion for OSC | \$ 395.00 | \$ 39.50 | Kate Hollist | |
| | Draft template opposition to plaintiff's motion for order to show | | | | |
| 9/30/2020 | 0.05 cause. | \$ 205.00 | \$ 10.25 | Leah Vulic | |
| 10/1/2020 | 0.65 Review communication from plaintiff. | \$ 530.00 | \$ 344.50 | Jeff Rosenfeld | |
| | Conference with Omar re: recent [REDACTED] | | | | |
| 10/1/2020 | 2.8 [REDACTED] | \$ 650.00 | \$ 1,820.00 | Karl Kronenberger | |
| | Internal conference re: response to Plaintiff's motion for OSC; identify additional potential arguments and research same; research whether | | | | |
| 10/1/2020 | 0.1 conflict exists due to allegations raised by Plaintiff. | \$ 395.00 | \$ 39.50 | Kate Hollist | |
| 10/2/2020 | 0.7 Review correspondence from plaintiff. | \$ 530.00 | \$ 371.00 | Jeff Rosenfeld | |
| 10/2/2020 | 1.7 Draft settlement agreement; review correspondence from Greenspan. | \$ 650.00 | \$ 1,105.00 | Karl Kronenberger | |
| | Internal conference re: prior restraint on speech and review case law | | | | |
| 10/2/2020 | 0.5 re: same. | \$ 395.00 | \$ 197.50 | Kate Hollist | |
| | Process and route Rule 11 motion filed by plaintiff into internal document management system; internal conference re: same; update | | | | |
| 10/5/2020 | 0.25 calendar accordingly. | \$ 205.00 | \$ 51.25 | Iyah Turminini | |
| | Review plaintiff's motion for Rule 11 sanctions; internal conference | | | | |
| 10/5/2020 | 0.5 re: same. | \$ 530.00 | \$ 265.00 | Jeff Rosenfeld | |
| | Internal conference re: opposition to order to show cause; review | | | | |
| 10/5/2020 | 0.25 motion for OSC and summarize factual allegations. | \$ 650.00 | \$ 162.50 | Karl Kronenberger | |
| | Internal conference with attorneys re: motion for sanctions; briefly | | | | |
| 10/5/2020 | 1.8 review same. | \$ 205.00 | \$ 369.00 | Leah Vulic | |
| | Review draft motion for sanctions sent by Plaintiff to identify additional points for incorporation into opposition; internal | | | | |
| 10/6/2020 | 1.9 counsel | \$ 395.00 | \$ 750.50 | Kate Hollist | |
| 10/7/2020 | 2.3 Continue drafting opposition to motion for OSC. | \$ 395.00 | \$ 908.50 | Kate Hollist | |
| | Continue drafting opposition to OSC motion; research ethics opinions to ascertain viability of Plaintiff's argument that tweeting to a broad audience is equal to communicating with a party; internal conference | | | | |
| 10/9/2020 | 0.5 re: same | \$ 395.00 | \$ 197.50 | Kate Hollist | |
| | Review and edit opposition to Greenspan motion for OSC re: | | | | |
| 10/12/2020 | 3.4 sanctions. | \$ 650.00 | \$ 2,210.00 | Karl Kronenberger | |
| | Complete draft to OSC motion. Internal conference and revisions re: | | | | |
| 10/12/2020 | 1.8 same; cite check in preparation for filing. | \$ 395.00 | \$ 711.00 | Kate Hollist | |
| | Internal conference re: opposition to plaintiff's order to show cause; review local rules re: proposed orders and filings of oppositions; review, finalize, and electronically file opposition; process and route | | | | |
| 10/13/2020 | 1.7 file-stamped opposition into internal document management system. | \$ 205.00 | \$ 348.50 | Iyah Turminini | |
| 10/13/2020 | 0.8 Review opposition to motion for OSC re: contempt. | \$ 530.00 | \$ 424.00 | Jeff Rosenfeld | |
| | Final revisions to opposition to OSC motion and internal conferences | | | | |
| 10/13/2020 | 0.1 re: same; cite-check newly added cases in prior restraint argument | \$ 395.00 | \$ 39.50 | Kate Hollist | |

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| 10/13/2020 | 0.6 Internal conference re: opposition to motion for order to show cause. Read Plaintiff's reply ISO his OSC motion and recent email | \$ 205.00 | \$ 123.00 | Leah Vulic |
| 10/14/2020 | 0.05 correspondence Process and route plaintiff's reply in support of motion for order to | \$ 395.00 | \$ 19.75 | Kate Hollist |
| 10/14/2020 | 0.45 show cause into document management system. Internal conference re: reply filed by plaintiff re: motion for order to | \$ 205.00 | \$ 92.25 | Leah Vulic |
| 10/15/2020 | 0.05 show cause; review reply and upcoming calendar deadlines generated by filing. | \$ 205.00 | \$ 10.25 | Iyah Turminini |
| 10/15/2020 | 0.45 Draft edits to settlement agreement and email client re: [REDACTED]. | \$ 650.00 | \$ 292.50 | Karl Kronenberger |
| 10/15/2020 | 0.55 Conference with client re: [REDACTED] | \$ 650.00 | \$ 357.50 | Karl Kronenberger |
| 10/16/2020 | 0.05 Internal conference re: plaintiff's opposition to motion to strike amended complaint, response to motion to dismiss,, and request for judicial notice; briefly review filed document and internal conference re: upcoming case deadlines. | \$ 205.00 | \$ 10.25 | Iyah Turminini |
| 10/16/2020 | 0.15 Review plaintiff's opposition to motions to dismiss and anti-SLAPP motion; internal communications re: same. | \$ 530.00 | \$ 79.50 | Jeff Rosenfeld |
| 10/16/2020 | 0.15 Process and route plaintiff's opposition to motions to dismiss and supporting documents into document management system. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 10/17/2020 | 0.05 Draft edits to settlement offer. | \$ 650.00 | \$ 32.50 | Karl Kronenberger |
| 10/19/2020 | 0.85 Review email correspondence re: transmission of SLAPP motion. | \$ 205.00 | \$ 174.25 | Iyah Turminini |
| 10/19/2020 | 0.15 Review opposition to anti-SLAPP motion/motion to dismiss. Dispatch caption page of anti-SLAPP motion to judicial council; | \$ 530.00 | \$ 79.50 | Jeff Rosenfeld |
| 10/19/2020 | 0.1 internal conference with attorneys re: same. | \$ 205.00 | \$ 20.50 | Leah Vulic |
| 10/21/2020 | 0 Research reply to anti-SLAPP motion and motion to dismiss. Continue researching and begin drafting reply to motion to anti-SLAPP | \$ 530.00 | \$ - | Jeff Rosenfeld |
| 10/23/2020 | 0.6 motion and motion to dismiss. | \$ 530.00 | \$ 318.00 | Jeff Rosenfeld |
| 10/26/2020 | 2.7 Internal conference re: issues with timing of filing of motion for sanctions by plaintiff against Smick defendants and KR; process and route filings into internal document management system; update calendar as necessary; review filings by plaintiff. | \$ 205.00 | \$ 553.50 | Iyah Turminini |
| 10/26/2020 | 0.7 Begin researching and drafting reply to anti-SLAPP motion and motion to dismiss. | \$ 530.00 | \$ 371.00 | Jeff Rosenfeld |
| 10/26/2020 | 1.25 Internal conference re: allegations in Plaintiff's motion for sanctions; review same and cross-reference with prior pleadings | \$ 395.00 | \$ 493.75 | Kate Hollist |
| 10/27/2020 | 0.35 Internal conference re: response to Rule 11 motion; continue researching and drafting reply to anti-SLAPP and motion to dismiss. Legal research re: plaintiff's premature filing of motion for sanctions; | \$ 530.00 | \$ 185.50 | Jeff Rosenfeld |
| 10/27/2020 | 0.35 Internal conference with attorneys re: same. Continue researching and drafting reply to anti-SLAPP and motion to | \$ 205.00 | \$ 71.75 | Leah Vulic |
| 10/28/2020 | 1.4 dismiss. | \$ 530.00 | \$ 742.00 | Jeff Rosenfeld |
| 10/28/2020 | 0.1 Begin outlining response to Plaintiff's motion for sanctions | \$ 395.00 | \$ 39.50 | Kate Hollist |
| 10/28/2020 | 0.65 Review calendar re: pending deadlines and hearings. Draft template opposition in response to plaintiff's rule 11 motion; | \$ 205.00 | \$ 133.25 | Leah Vulic |
| 10/29/2020 | 1.25 internal conference re: same. Continue researching and drafting reply to anti-SLAPP motion and | \$ 205.00 | \$ 256.25 | Iyah Turminini |
| 10/29/2020 | 2.7 motion to dismiss. | \$ 530.00 | \$ 1,431.00 | Jeff Rosenfeld |
| 10/29/2020 | 0.15 Start drafting response to Plaintiff's motion for sanctions. | \$ 395.00 | \$ 59.25 | Kate Hollist |
| 10/29/2020 | 1.85 Internal conferences re: pending motions. Continue researching and drafting reply in support of anti-SLAPP | \$ 205.00 | \$ 379.25 | Leah Vulic |
| 10/30/2020 | 1.3 motion and motion to dismiss. | \$ 530.00 | \$ 689.00 | Jeff Rosenfeld |

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| 10/30/2020 | 0.6 Continue drafting response to Plaintiff's motion for sanctions. Review email correspondence re: anti-SLAPP motion and motion to dismiss; internal conference re: same; briefly review reply; review order issued by court re: motion for order to show cause and filing by | \$ 395.00 | \$ 237.00 | Kate Hollist |
| 11/2/2020 | 2.2 plaintiff re: same. Continue researching and drafting reply to anti-SLAPP motion and | \$ 205.00 | \$ 451.00 | Iyah Turminini |
| 11/2/2020 | 0.45 motion to dismiss. | \$ 530.00 | \$ 238.50 | Jeff Rosenfeld |
| 11/2/2020 | 0.25 Review and edit reply to anti-SLAPP motion. | \$ 650.00 | \$ 162.50 | Karl Kronenberger |
| 11/2/2020 | 0.2 Review and revise reply in support of motion to dismiss. Internal communications and conference re: reply to anti-SLAPP and | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 11/3/2020 | 1.3 motion to dismiss. Internal conference re: reply ISO anti-SLAPP motion; review and revise same and cross-reference arguments raised here against | \$ 530.00 | \$ 689.00 | Jeff Rosenfeld |
| 11/3/2020 | 0.25 allegations contained in motion for sanctions Process and route plaintiff's statement of recent decision and order vacating hearing on order to show cause into document management | \$ 395.00 | \$ 98.75 | Kate Hollist |
| 11/3/2020 | 0.3 system. | \$ 205.00 | \$ 61.50 | Leah Vulic |
| 11/4/2020 | 2.8 Internal conference re: reply filing; briefly review reply. | \$ 205.00 | \$ 574.00 | Iyah Turminini |
| 11/4/2020 | 1.75 Continue drafting opposition to motion for sanctions. | \$ 395.00 | \$ 691.25 | Kate Hollist |
| 11/4/2020 | 1.75 Review and revisei reply in support of motion to dismiss/anti-SLAPP. Further review and revise reply to anti-SLAPP motion and motion to | \$ 205.00 | \$ 358.75 | Leah Vulic |
| 11/5/2020 | 1.9 dismiss; internal conference re: same. Internal conference re: finalizing reply to Anti-SLAPP motion and assist with same; continue drafting opposition to motion for | \$ 530.00 | \$ 1,007.00 | Jeff Rosenfeld |
| 11/5/2020 | 0.7 sanctions. Internal conference with attorneys re: reply in support of motion to | \$ 395.00 | \$ 276.50 | Kate Hollist |
| 11/5/2020 | 0.2 dismiss; draft tables of contents and authorites. Briefly review reply filings by defendants Musk and Tesla in support of | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 11/6/2020 | 3.1 motion to dismiss. | \$ 205.00 | \$ 635.50 | Iyah Turminini |
| 11/6/2020 | 0.4 Continue drafting opposition to motion for sanctions. Internal conference re: opposition to Rule 11 motion; review email | \$ 395.00 | \$ 158.00 | Kate Hollist |
| 11/9/2020 | 0.5 correspondence re: same; briefly review opposition. Review and revise opposition to plaintiff's motion for Rule 11 | \$ 205.00 | \$ 102.50 | Iyah Turminini |
| 11/9/2020 | 0.2 sanctions. | \$ 530.00 | \$ 106.00 | Jeff Rosenfeld |
| 11/9/2020 | 2.7 Review and edit opposition to Rule 11 motion. Complete draft opposition to motion for sanctions; internal conference re: same; incorporate team revisions re: same; finalize | \$ 650.00 | \$ 1,755.00 | Karl Kronenberger |
| 11/9/2020 | 1.95 same for filing. Process and route Tesla defendants' reply in support of motion to dismiss into document management system; draft attorney declaration in support of opposition to motion for sanctions; review citations for accuracy; revise, finalize, and electronically file opposition to plaintiff's motion for sanctions and attorney declaration | \$ 395.00 | \$ 770.25 | Kate Hollist |
| 11/9/2020 | 0.2 in support thereof. Process and route plaintiff's reply in support of motion for sanctions into document management system; internal conference with | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 11/16/2020 | 0.7 attorney re: same. Read Plaintiff's reply in support of his motion for sanctions and | \$ 205.00 | \$ 143.50 | Leah Vulic |
| 11/17/2020 | 0.1 annotate same in preparation for oral argument on subject. | \$ 395.00 | \$ 39.50 | Kate Hollist |
| 11/20/2020 | 0.05 Read plaintiff's request for judicial notice. Process and route plaintiff's request for judicial notice in support of | \$ 395.00 | \$ 19.75 | Kate Hollist |
| 11/20/2020 | 0.25 second amended complaint into document management system. Internal conference re: request for judicial notice filed by plaintiff; | \$ 205.00 | \$ 51.25 | Leah Vulic |
| 12/3/2020 | 0.05 briefly review request for judicial notice. | \$ 205.00 | \$ 10.25 | Iyah Turminini |

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|------------|------|---|-----------|-----------|-------------------|
| 12/4/2020 | 0.2 | Process and route plaintiff's request for judicial notice in support of second amended complaint into document management system. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 12/7/2020 | 0.1 | Internal conference re: order by court re: motions to strike, dismiss, and for sanctions vacating oral arguments; briefly review order. | \$ 205.00 | \$ 20.50 | Iyah Turminini |
| 12/7/2020 | 0.15 | Process and route order taking motion hearings off calendar into document management system. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 12/9/2020 | 0.15 | Briefly review response filed by Tesla defendants re: plaintiff's request for judicial notice. | \$ 205.00 | \$ 30.75 | Iyah Turminini |
| 12/9/2020 | 0.1 | Briefly review plaintiff's request for judicial notice, Tesla/Musk's opposition thereto, and correspondence re: same. | \$ 530.00 | \$ 53.00 | Jeff Rosenfeld |
| 12/9/2020 | 0.05 | Process and route Tesla defendants' response to plaintiff's requests for judicial notice into document management system. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 12/10/2020 | 0.25 | Review plaintiff's correspondence re: amending complaint. | \$ 530.00 | \$ 132.50 | Jeff Rosenfeld |
| 12/11/2020 | 0.05 | Review correspondence re: supplemental pleading; review case status and media coverage. | \$ 530.00 | \$ 26.50 | Jeff Rosenfeld |
| 12/11/2020 | 0.2 | Review correspondence with plaintiff re: supplemental complaint. | \$ 415.00 | \$ 83.00 | Liana Chen |
| 12/14/2020 | 0.15 | Internal correspondence re: publication of background posts; review briefly same. | \$ 415.00 | \$ 62.25 | Liana Chen |
| 12/15/2020 | 0.6 | Internal conference re: [REDACTED]; conference with client re: same. | \$ 530.00 | \$ 318.00 | Jeff Rosenfeld |
| 12/15/2020 | 0.15 | Conference with client re: [REDACTED]. | \$ 650.00 | \$ 97.50 | Karl Kronenberger |
| 12/28/2020 | 0.15 | Review correspondence from plaintiff re: intended motion for default; internal conference re: same; research re: same. | \$ 530.00 | \$ 79.50 | Jeff Rosenfeld |
| 12/28/2020 | 1 | Process and route plaintiff's administrative motion for leave to file for default against corporate defendant into document management system; update calendar re: same. | \$ 205.00 | \$ 205.00 | Leah Vulic |
| 12/29/2020 | 0.15 | Review plaintiff's administrative for leave to file motion for default against Smick; research re: same; draft opposition to same; internal communications re: same. | \$ 530.00 | \$ 79.50 | Jeff Rosenfeld |
| 12/29/2020 | 0.05 | Internal conference with attorneys re: plaintiff's motion for leave to take default. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 12/30/2020 | 0.85 | Review and revise proposed order denying plaintiff's administrative motion for leave to seek default. | \$ 530.00 | \$ 450.50 | Jeff Rosenfeld |
| 12/30/2020 | 0.05 | Draft proposed order; revise, finalize, and electronically file opposition to plaintiff's administrative motion for leave to file default against Smick; dispatch Word version of proposed order to chambers. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 12/31/2020 | 0.15 | Review plaintiff's reply to administrative motion for leave to seek default against Smick; internal communication re: same. | \$ 530.00 | \$ 79.50 | Jeff Rosenfeld |
| 12/31/2020 | 0.2 | Process and route plaintiff's reply in support of administrative motion for default into document management system; internal conference with attorneys re: impropriety of same. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 1/7/2021 | 0.3 | Review DMCA counternotice and correspondence. | \$ 550.00 | \$ 165.00 | Jeff Rosenfeld |
| 1/7/2021 | 0.05 | Conference with client re: [REDACTED]. | \$ 650.00 | \$ 32.50 | Karl Kronenberger |
| 1/11/2021 | 0.6 | Review correspondence from plaintiff. | \$ 550.00 | \$ 330.00 | Jeff Rosenfeld |
| 1/13/2021 | 0.3 | Read Plaintiff's motion to compel compliance with civility order (without exhibits); internal conference re: same. | \$ 395.00 | \$ 118.50 | Kate Hollist |
| 1/13/2021 | 4.2 | Process and route plaintiff's motion to compel compliance with court order into document management system; update calendar re: filing of and hearing on same. | \$ 205.00 | \$ 861.00 | Leah Vulic |

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| | Read exhibits to Plaintiff's motion to compel compliance with civility order and notes re: same; begin outlining opposition to same; read Plaintiff's motion for leave to file third amended complaint; read proposed third amended complaint; notes on factual differences; | | | | |
| 1/14/2021 | 0.1 begin outlining response to same. Internal conference re: order granting request for leave to file TAC; | \$ 395.00 | \$ 39.50 | Kate Hollist | |
| 1/15/2021 | 0.3 review order. Review plaintiff's motion for leave to file supplemental complaint; review court's order same; internal conference re: case status and | \$ 205.00 | \$ 61.50 | Iyah Turminini | |
| 1/15/2021 | 0.2 strategy. | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld | |
| 1/15/2021 | 2.4 Internal conference re: new potential complaint. Internal conference re: strategy for oppositions; read court order granting leave to file proposed amended complaint; internal conference re: same; internal conference to discuss potentially problematic language from exhibits cited in Plaintiff's motion to compel compliance; begin preparing factual arguments to contest | \$ 650.00 | \$ 1,560.00 | Karl Kronenberger | |
| 1/15/2021 | 0.3 same. Process and route plaintiff's motion for leave to file amended complaint and order granting same into document management | \$ 395.00 | \$ 118.50 | Kate Hollist | |
| 1/15/2021 | 0.9 system; update calendar re same. Work on factual background for opposition to Plaintiff's motion to | \$ 205.00 | \$ 184.50 | Leah Vulic | |
| 1/18/2021 | 0.75 compel compliance. Begin researching and drafting template anti-SLAPP motion re: | \$ 395.00 | \$ 296.25 | Kate Hollist | |
| 1/19/2021 | 0.2 anticipated third amended complaint. Draft opposition to plaintiff's motion for order to compel compliance | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld | |
| 1/19/2021 | 1.8 with court order. Review email correspondence between Defense counsel and Plaintiff to identify additional arguments that Plaintiff (not Defendants) are violating the Court's civility order; incorporate same into draft | \$ 205.00 | \$ 369.00 | Leah Vulic | |
| 1/20/2021 | 2.6 opposition. Cite check new cases and arguments raised by Plaintiff in the motion to compel compliance; review ethics decisions on rules for professional conduct to identify where Plaintiff has overreached; | \$ 395.00 | \$ 1,027.00 | Kate Hollist | |
| 1/21/2021 | 1.4 incorporate counterarguments into motion. Continue drafting opposition; research re: standard for obtaining | \$ 395.00 | \$ 553.00 | Kate Hollist | |
| 1/22/2021 | 0.2 sanctions on frivolous motion to compel. Internal conference re: order issued by court re: conduct, service, and | \$ 395.00 | \$ 79.00 | Kate Hollist | |
| 1/25/2021 | 0.2 default motions; review order. Review court's order on various motions; internal conference re: | \$ 205.00 | \$ 41.00 | Iyah Turminini | |
| 1/25/2021 | 1.15 same. Incorporate legal arguments from prior motion practice to opposition to motion to compel; read Court's order denying motion to compel | \$ 550.00 | \$ 632.50 | Jeff Rosenfeld | |
| 1/25/2021 | 0.2 (amongst other motions); internal conference re: same. Process and route order on conduct and default into document | \$ 395.00 | \$ 79.00 | Kate Hollist | |
| 1/25/2021 | 0.1 management system; review same. | \$ 205.00 | \$ 20.50 | Leah Vulic | |
| 1/27/2021 | 1 Review plaintiff's recent publications. Review and research correspondence from plaintiff; begin researching and drafting anti-SLAPP motion to anticipated third amended | \$ 550.00 | \$ 550.00 | Jeff Rosenfeld | |
| 1/29/2021 | 0.65 complaint. Review case deadlines; review status of social media postings; | \$ 550.00 | \$ 357.50 | Jeff Rosenfeld | |
| 2/1/2021 | 0.6 continue researching and drafting anticipatory anti-SLAPP motion. | \$ 550.00 | \$ 330.00 | Jeff Rosenfeld | |
| 2/2/2021 | 0.95 dismiss in anticipation of third amended complaint. Continue researching and drafting anti-SLAPP motion and motion to | \$ 550.00 | \$ 522.50 | Jeff Rosenfeld | |

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| 2/3/2021 | 0.7 | Continue researching anti-SLAPP motion in anticipation of third amended complaint. | \$ 550.00 | \$ 385.00 | Jeff Rosenfeld |
| 2/9/2021 | 0.1 | Review status of plaintiff's online postings and news coverage of same. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 2/10/2021 | 0.1 | Continue researching and compiling exhibits for anticipated anti-SLAPP motion. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 2/12/2021 | 0 | Process and route third amended complaint into document management system. | \$ 205.00 | \$ - | Leah Vulic |
| 2/16/2021 | 0.8 | Review third amended complaint; continue researching and drafting anti-SLAPP motion and motion to dismiss same. | \$ 550.00 | \$ 440.00 | Jeff Rosenfeld |
| 2/16/2021 | 0.15 | Internal conference with attorneys re: third amended complaint; process and route exhibits to same into document management system; update calendar re: service of complaint and deadline to respond; run comparisons of proposed third amended complaint and filed third amended complaint. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 2/17/2021 | 0.35 | Internal conference with attorneys re: third amended complaint and motion to dismiss. | \$ 205.00 | \$ 71.75 | Leah Vulic |
| 2/18/2021 | 0.35 | Internal conference re: drafting anti-SLAPP motion and motion to dismiss; review draft stipulation re: same. | \$ 550.00 | \$ 192.50 | Jeff Rosenfeld |
| 2/18/2021 | 0.25 | Internal conference re: renewed motion to dismiss. | \$ 650.00 | \$ 162.50 | Karl Kronenberger |
| 2/18/2021 | 0.35 | Conference with client re: [REDACTED]. | \$ 650.00 | \$ 227.50 | Karl Kronenberger |
| 2/18/2021 | 2.1 | Internal conference re: TAC and upcoming motion to dismiss. | \$ 395.00 | \$ 829.50 | Kate Hollist |
| 2/19/2021 | 0.15 | Review third amended complaint; continue researching and drafting anti-SLAPP motion and motion to dismiss. | \$ 550.00 | \$ 82.50 | Jeff Rosenfeld |
| 2/19/2021 | 0.3 | Internal conference re: joint administrative motion requesting extension of time and page limits. | \$ 395.00 | \$ 118.50 | Kate Hollist |
| 2/19/2021 | 3.6 | Process and route joint administrative motion re: timing and page limits for motion to dismiss and plaintiff's response into document management system; update calendar re: same; internal conference with attorney re: same. | \$ 205.00 | \$ 738.00 | Leah Vulic |
| 2/22/2021 | 3.8 | Continue researching and drafting anti-SLAPP motion and motion to dismiss. | \$ 550.00 | \$ 2,090.00 | Jeff Rosenfeld |
| 2/22/2021 | 2.65 | Review redline of TAC as filed compared to proposed TAC previously submitted by Plaintiff; review prior filings by Tesla for discussion of securities claims; research re: market manipulation claims and pleading requirements. | \$ 395.00 | \$ 1,046.75 | Kate Hollist |
| 2/23/2021 | 3.4 | Continue researching and drafting anti-SLAPP motion and motion to dismiss. | \$ 550.00 | \$ 1,870.00 | Jeff Rosenfeld |
| 2/23/2021 | 2.15 | Begin drafting select arguments for motion to dismiss; additional research re: effect of broad, non-specific audience on alleged market manipulation; begin research re: copyright issues. | \$ 395.00 | \$ 849.25 | Kate Hollist |
| 2/24/2021 | 2.95 | Continue researching and drafting anti-SLAPP motion and motion to dismiss TAC. | \$ 550.00 | \$ 1,622.50 | Jeff Rosenfeld |
| 2/24/2021 | 2.2 | Continue researching and drafting motion to dismiss; internal conference re: same. | \$ 395.00 | \$ 869.00 | Kate Hollist |
| 2/25/2021 | 4.8 | Continue researching and drafting anti-SLAPP motion and motion to dismiss TAC. | \$ 550.00 | \$ 2,640.00 | Jeff Rosenfeld |
| 2/25/2021 | 0.35 | Finalize initial draft of arguments for motion to dismiss TAC; internal conferences re: same; review order granting extension for page limits. | \$ 395.00 | \$ 138.25 | Kate Hollist |
| 2/25/2021 | 2.4 | Process and route order re: briefing schedule and page limits re: motions to dismiss into document management system; update calendar re: same. | \$ 205.00 | \$ 492.00 | Leah Vulic |
| 2/26/2021 | 1.6 | Continue researching and drafting anti-SLAPP motion and motion to dismiss. | \$ 550.00 | \$ 880.00 | Jeff Rosenfeld |

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| | Internal conference to strategize re: Court's denial of request for additional pages; begin revising to streamline arguments; draft email to Tesla's counsel requesting conference to minimize duplication of | | | | |
| 2/26/2021 | 0.2 argument in motions. | \$ 395.00 | \$ 79.00 | Kate Hollist | |
| | Internal conference with attorney re: exhibit to third amended | | | | |
| 2/26/2021 | 1.05 complaint; update exhibits. | \$ 205.00 | \$ 215.25 | Leah Vulic | |
| | Continue researching and drafting anti-SLAPP motion and motion to | | | | |
| 3/1/2021 | 0.7 dismiss TAC. | \$ 550.00 | \$ 385.00 | Jeff Rosenfeld | |
| 3/1/2021 | 1.1 Continue streamlining motion to dismiss. | \$ 395.00 | \$ 434.50 | Kate Hollist | |
| | Continue researching and drafting anti-SLAPP motion and motion to | | | | |
| 3/2/2021 | 0.65 dismiss TAC. | \$ 550.00 | \$ 357.50 | Jeff Rosenfeld | |
| | Continue researching and drafting anti-SLAPP motion and motion to | | | | |
| 3/3/2021 | 0.35 dismiss TAC. | \$ 550.00 | \$ 192.50 | Jeff Rosenfeld | |
| | Internal conference and communications re: coordination with | | | | |
| | Tesla/Musk counsel; communicate with same; research market | | | | |
| 3/4/2021 | 0 manipulation issues. | \$ 550.00 | \$ - | Jeff Rosenfeld | |
| 3/4/2021 | 0.75 Internal conference re: Tesla's briefing and emails with Tesla re: same. | \$ 395.00 | \$ 296.25 | Kate Hollist | |
| | Continue researching market manipulation claim for motion to | | | | |
| 3/5/2021 | 2.4 dismiss TAC; conference with Musk/Tesla counsel re: same. | \$ 550.00 | \$ 1,320.00 | Jeff Rosenfeld | |
| | Internal conference re: Judge Donato's standing requirement to | | | | |
| | coordinate briefing with Tesla; correspondence with Tesla's counsel | | | | |
| | re: same; confer with Tesla re: same; revise briefing to address | | | | |
| | market manipulation claim in light of Tesla's decision not to address | | | | |
| 3/5/2021 | 1.8 the same. | \$ 395.00 | \$ 711.00 | Kate Hollist | |
| | Incorporate copyright and securities arguments into motion to | | | | |
| 3/9/2021 | 0.1 dismiss; streamline further to accommodate Court's page limits. | \$ 395.00 | \$ 39.50 | Kate Hollist | |
| 3/10/2021 | 3.5 Begin finalizing anti-SLAPP motion and motion to dismiss TAC. | \$ 550.00 | \$ 1,925.00 | Jeff Rosenfeld | |
| | Continue reviewing and finalizing anti-SLAPP motion and motion to | | | | |
| 3/11/2021 | 0.65 dismiss TAC. | \$ 550.00 | \$ 357.50 | Jeff Rosenfeld | |
| 3/11/2021 | 0.95 Review and edit motion to dismiss; internal conference re same. | \$ 650.00 | \$ 617.50 | Karl Kronenberger | |
| | Assist in finalizing motion to dismiss; review and revise same; internal | | | | |
| 3/11/2021 | 3.9 conference re: same. | \$ 395.00 | \$ 1,540.50 | Kate Hollist | |
| | Internal conference re: anti-SLAPP motion and motion to dismiss | | | | |
| | Third Amended Complaint; internal conference re: proposed order | | | | |
| | requirement; review local rules and judge's standing orders for | | | | |
| | motion filings; review motion, declaration of K. Kronenberger, and | | | | |
| | proposed order; compile and format exhibits to accompany | | | | |
| | declaration; internal conference re: same; finalize motion, | | | | |
| | declaration, and proposed order and file using ECF system; process | | | | |
| | and route file-stamped copies of motion documents into internal | | | | |
| | document management system; transmit proposed order and filed | | | | |
| | documents to judge's chambers via email; review calendar and | | | | |
| | update as necessary; further transmit SLAPP documents to the court | | | | |
| 3/12/2021 | 0.5 via email. | \$ 205.00 | \$ 102.50 | Iyah Turminini | |
| 3/12/2021 | 0.35 Finalize and file anti-SLAPP motion and motion to dismiss TAC. | \$ 550.00 | \$ 192.50 | Jeff Rosenfeld | |
| 3/12/2021 | 0.15 Draft table of authorities; internal conference re: filing of motion. | \$ 205.00 | \$ 30.75 | Leah Vulic | |
| | Process and route Tesla defendants' motion to dismiss and supporting | | | | |
| 3/15/2021 | 0.05 documents into document management system. | \$ 205.00 | \$ 10.25 | Leah Vulic | |
| 3/16/2021 | 0.05 Review correspondence from opposing counsel. | \$ 550.00 | \$ 27.50 | Jeff Rosenfeld | |

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| 3/30/2021 | 0.3 | Review calendar re: motion to dismiss deadlines. Review opposing party's request for cited document and attached | \$ 205.00 | \$ 61.50 | Leah Vulic |
| 4/5/2021 | 0.05 | publications; internal conference re: same. | \$ 550.00 | \$ 27.50 | Jeff Rosenfeld |
| 4/7/2021 | 0.6 | Review correspondence from opposing party. | \$ 550.00 | \$ 330.00 | Jeff Rosenfeld |
| 4/8/2021 | 0.15 | Internal conference re: filings by plaintiff; briefly review plaintiff's oppositions to Tesla and Smick defendants' motions to dismiss, request for judicial notice, and supporting declaration. | \$ 205.00 | \$ 30.75 | Iyah Turminini |
| 4/8/2021 | 1.2 | Process and route plaintiff's oppositions and supporting documents to motions to dismiss into document management system. | \$ 205.00 | \$ 246.00 | Leah Vulic |
| 4/9/2021 | 0.9 | Review plaintiff's opposition to anti-SLAPP motion and motion to dismiss; internal conference re: same; communicate with client re: [REDACTED] | \$ 550.00 | \$ 495.00 | Jeff Rosenfeld |
| 4/9/2021 | 1.05 | Read Plaintiff's opposition to motion to dismiss; internal conference re: strategy for replying to same. | \$ 395.00 | \$ 414.75 | Kate Hollist |
| 4/9/2021 | 1.6 | Review plaintiff's opposition to motion to dismiss/anti-SLAPP motion; run Westlaw authority checking report; draft template reply. | \$ 205.00 | \$ 328.00 | Leah Vulic |
| 4/12/2021 | 2.3 | Begin researching and drafting reply to motion to dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 1,265.00 | Jeff Rosenfeld |
| 4/12/2021 | 2 | Review case law relied upon by Plaintiff for copyright claims to identify distinguishing factors; research re: standard for fair use where parody arguably decreases sales. | \$ 395.00 | \$ 790.00 | Kate Hollist |
| 4/13/2021 | 0.6 | Review correspondence from Plaintiff; continue researching and drafting reply to motion to dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 330.00 | Jeff Rosenfeld |
| 4/13/2021 | 0.3 | Review Tesla's briefing and Plaintiff's opposition to same to identify common arguments. | \$ 395.00 | \$ 118.50 | Kate Hollist |
| 4/15/2021 | 0.2 | Internal conference re: filing by plaintiff; briefly review motion for leave to file ex parte motion for temporary restraining order and accompanying motion documents. | \$ 205.00 | \$ 41.00 | Iyah Turminini |
| 4/15/2021 | 0.5 | Internal conference re: plaintiff's ex parte motion for temporary restraining order. | \$ 550.00 | \$ 275.00 | Jeff Rosenfeld |
| 4/15/2021 | 1.4 | Conference with counsel for Tesla; call to client re: [REDACTED] | \$ 650.00 | \$ 910.00 | Karl Kronenberger |
| 4/15/2021 | 0.25 | Review Plaintiff's motion for leave to seek restraining order; internal conference re: same; review Plaintiff's cited authority and outline response to same. | \$ 395.00 | \$ 98.75 | Kate Hollist |
| 4/15/2021 | 0.1 | Process and route plaintiff's request for leave to file motion for temporary restraining order into document management system; review same. | \$ 205.00 | \$ 20.50 | Leah Vulic |
| 4/16/2021 | 0.7 | Internal conference re: order denying plaintiff's motion for leave to file ex parte restraining order. | \$ 205.00 | \$ 143.50 | Iyah Turminini |
| 4/16/2021 | 2.1 | Continue researching and drafting reply to motion to dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 1,155.00 | Jeff Rosenfeld |
| 4/16/2021 | 0.05 | Review judge's order denying Plaintiff's motion for leave to seek restraining order; begin drafting copyright and market manipulation arguments for reply in support of motion to dismiss. | \$ 395.00 | \$ 19.75 | Kate Hollist |
| 4/16/2021 | 0.15 | Process and route order denying plaintiff's request to file motion for temporary restraining order into document management system; advise attorneys re: receipt of same. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 4/19/2021 | 1 | Review correspondence from plaintiff; continue researching and drafting reply to motion to dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 550.00 | Jeff Rosenfeld |
| 4/20/2021 | 1.3 | Continue researching and drafting reply to motion to dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 715.00 | Jeff Rosenfeld |
| 4/20/2021 | 2.55 | Review correspondence with Plaintiff; internal conference re: same; continue research/drafting for reply in support of motion to dismiss. | \$ 550.00 | \$ 1,402.50 | Jeff Rosenfeld |

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| 4/21/2021 | Continue researching and drafting reply to motion to dismiss/anti- 1.9 SLAPP motion; internal conference re: same. | \$ 550.00 | \$ 1,045.00 | Jeff Rosenfeld |
| 4/21/2021 | Continue drafting reply in support of motion to dismiss; review allegations in Complaint to confirm factual discrepancies in Plaintiff's 3.15 claims and limited scope of copyright causes of action. | \$ 395.00 | \$ 1,244.25 | Kate Hollist |
| 4/22/2021 | Continue researching and drafting reply to motion to dismiss/anti- 1.7 SLAPP motion. | \$ 550.00 | \$ 935.00 | Jeff Rosenfeld |
| 4/22/2021 | Incorporate arguments into reply in support of motion to dismiss; 1.65 review and revise same. | \$ 395.00 | \$ 651.75 | Kate Hollist |
| 4/23/2021 | Internal conference re: reply in support of motion to strike and dismiss third amended complaint; review local rules and judge's standing orders; internal conference re: same; review, finalize, and electronically file reply using court's ECF system; process and route file-stamped reply into internal document management system; transmit reply to SLAPP department via email; review calendar and 1.35 update as necessary. | \$ 205.00 | \$ 276.75 | Iyah Turminini |
| 4/23/2021 | Review, revise, and finalize reply to motion to dismiss/anti-SLAPP 0.35 motion; briefly review Tesla defendants' reply. | \$ 550.00 | \$ 192.50 | Jeff Rosenfeld |
| 4/23/2021 | 0.3 Review and edit reply to motion to dismiss. | \$ 650.00 | \$ 195.00 | Karl Kronenberger |
| 4/23/2021 | Final review of reply in support of motion to dismiss; internal 0.55 conference re: same. | \$ 395.00 | \$ 217.25 | Kate Hollist |
| 4/23/2021 | Draft table of authorities; internal conferences re: filing of reply; process and route Tesla defendants' reply in support of motion to 0.05 dismiss into document management system. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 4/26/2021 | 0.1 Review status of parallel defamation case. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 4/29/2021 | Review plaintiff's motion for leave to file sur reply; internal 0.1 conference re: same. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 4/29/2021 | Process and route plaintiff's motion to file sur-reply and second 0.05 request for judicial notice into document management system. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 5/10/2021 | Review plaintiff's motion for leave to file a sur-reply to motion to 0.15 dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 82.50 | Jeff Rosenfeld |
| 5/10/2021 | Process and route plaintiff's motion for leave to file sur-reply into 0.2 document management system; review same. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 5/11/2021 | Internal conference re: withdrawal of motion to file combined sur- reply, motion for leave to file combined sur-reply, and case strategy; 0.05 briefly review plaintiff's filings. | \$ 205.00 | \$ 10.25 | Iyah Turminini |
| 5/12/2021 | Review text-only order granting plaintiff leave to file sur-reply to 0.1 motion to dismiss/anti-SLAPP motion. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 5/13/2021 | Process and route order re: sur-reply and sur-reply into document 0.05 management system. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 6/1/2021 | Process and route Tesla defendants' notice of change of address into 0.2 document management system. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 6/23/2021 | Review court's order on on motion to dismiss; internal conference re: 1.95 same. | \$ 550.00 | \$ 1,072.50 | Jeff Rosenfeld |
| 6/23/2021 | Review court's order on motion to dismiss; internal conference re: same; conference with A. Greenspan re: settlement; follow up with 0.55 client re: [REDACTED] | \$ 650.00 | \$ 357.50 | Karl Kronenberger |
| 6/23/2021 | Process and route order on motions to dismiss and strike into 0.1 document management system; review same. | \$ 205.00 | \$ 20.50 | Leah Vulic |
| 6/25/2021 | 0.15 Update calendar re: deadline for plaintiff to file amended complaint. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 6/26/2021 | 0.3 Research re: new case against client. | \$ 205.00 | \$ 61.50 | Leah Vulic |
| 6/29/2021 | 0.35 Conference with A. Greenspan re: settlement. | \$ 650.00 | \$ 227.50 | Karl Kronenberger |
| 7/2/2021 | 0.1 Conference with A. Greenspan re: settlement. | \$ 650.00 | \$ 65.00 | Karl Kronenberger |

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| 7/2/2021 | 0.35 | Process and route plaintiff's administrative order to enlarge time to file fourth amended complaint into document management system. | \$ 205.00 | \$ 71.75 | Leah Vulic |
| 7/6/2021 | 0.1 | Draft settlement offer; conference with A. Greenspan re: same. | \$ 650.00 | \$ 65.00 | Karl Kronenberger |
| 7/6/2021 | 0.15 | Process and route Tesla's opposition to plaintiff's motion for extension of time to file fourth amended complaint into document management system. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 7/7/2021 | 0.5 | Process and route order granting request to extend time to file fourth amended complaint into document management system; update calendar re: same. | \$ 205.00 | \$ 102.50 | Leah Vulic |
| 7/9/2021 | 0.35 | Multiple calls re: settlement with A. Greenspan and client. | \$ 650.00 | \$ 227.50 | Karl Kronenberger |
| 7/13/2021 | 0.3 | Review case status and recent filings; research tolling of state statute of limitations during pendency of federal lawsuit. | \$ 550.00 | \$ 165.00 | Jeff Rosenfeld |
| 7/14/2021 | 0.25 | Internal communications re: case status; research potential for plaintiff to voluntarily dismiss federal action and pursue state action. | \$ 550.00 | \$ 137.50 | Jeff Rosenfeld |
| 7/16/2021 | 0.85 | Process and route plaintiff's motion for recusal into document management system; review same. | \$ 205.00 | \$ 174.25 | Leah Vulic |
| 7/19/2021 | 0.2 | Review plaintiff's motion for recusal; research status of parallel defamation action. | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld |
| 7/19/2021 | 0.15 | Draft preservation notice to A. Greenspan. | \$ 650.00 | \$ 97.50 | Karl Kronenberger |
| 7/19/2021 | 0.4 | Update calendar re: filing of plaintiff's motion for recusal. | \$ 205.00 | \$ 82.00 | Leah Vulic |
| 7/20/2021 | 0.2 | Internal conference re: motion for recusal filed by plaintiff; review motion for recusal; review case calendar for upcoming deadlines; | \$ 205.00 | \$ 41.00 | Iyah Turminini |
| 7/20/2021 | 0.1 | internal conference re: case strategy. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 7/21/2021 | 0.05 | Review case status; research recusal statute. | \$ 205.00 | \$ 10.25 | Leah Vulic |
| 7/27/2021 | 0.15 | Internal conference with attorneys re: plaintiff's motion for recusal. Review court order denying motion for recusal and re: fourth amended complaint. | \$ 550.00 | \$ 82.50 | Jeff Rosenfeld |
| 7/27/2021 | 0.2 | Process and route order re: recusal into document management system; review same. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 8/13/2021 | 0.6 | Process and route fourth amended complaint into document management system; update calendar re: service of same. | \$ 205.00 | \$ 123.00 | Leah Vulic |
| 8/16/2021 | 0.6 | Review fourth amended complaint. | \$ 550.00 | \$ 330.00 | Jeff Rosenfeld |
| 8/17/2021 | 0.55 | Continue reviewing fourth amended complaint. | \$ 550.00 | \$ 302.50 | Jeff Rosenfeld |
| 8/19/2021 | 0.1 | Internal conferences re: defense funding issue; research re: same; research recent anti-SLAPP decisions in preparation for researching and drafting anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 8/20/2021 | 0.05 | Communicate with counsel re: briefing schedule for motion to dismiss fourth amended complaint; internal conference re: litigation defense donations. | \$ 550.00 | \$ 27.50 | Jeff Rosenfeld |
| 8/25/2021 | 0.2 | Process and route stipulation re: briefing schedule into document management system. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 8/26/2021 | 0.2 | Process and route order on stipulation for briefing schedule on motions to dismiss into document management system; update calendar re: same. | \$ 205.00 | \$ 41.00 | Leah Vulic |
| 8/30/2021 | 0.5 | Review correspondence from plaintiff and client re: [REDACTED] | \$ 550.00 | \$ 275.00 | Jeff Rosenfeld |
| 8/31/2021 | 0.2 | Communicate with client re: [REDACTED]; review plaintiff's emergency motion to preserve evidence; communicate with client re: [REDACTED]; limited research re: same. | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld |

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| 8/31/2021 | 0.4 | Process and route plaintiff's emergency motion to preserve evidence into document management system; update calendar re: same. | \$ 205.00 | \$ 82.00 | Leah Vulic |
| 9/1/2021 | 2.75 | Internal conference re: opposition and case strategy; review email correspondence to client; briefly review draft opposition and declaration; review case calendar and upcoming deadlines. | \$ 205.00 | \$ 563.75 | Iyah Turminini |
| 9/1/2021 | 0.5 | Review court order re: plaintiff's motion to preserve evidence (car); communicate with client re: [REDACTED]; begin researching and drafting response to same. | \$ 550.00 | \$ 275.00 | Jeff Rosenfeld |
| 9/1/2021 | 1.85 | Process and route order directing defendant to respond to plaintiff's emergency motion into document management system; internal conferences with attorney re: same; revise, finalize, and dispatch for signature client declaration. | \$ 205.00 | \$ 379.25 | Leah Vulic |
| 9/2/2021 | 0.95 | Finalize and file opposition to plaintiff's motion for preservation order; communicate with client re: [REDACTED]; begin researching motion to dismiss Fourth Amended Complaint and motion to strike same; review plaintiff's reply; communicate with client re: [REDACTED] | \$ 550.00 | \$ 522.50 | Jeff Rosenfeld |
| 9/2/2021 | 0.15 | Process and route signed client declaration into document management system; revise, finalize, and electronically file opposition to plaintiff's emergency motion to preserve evidence; process and route plaintiff's reply and order denying emergency motion into document management system; review same. | \$ 205.00 | \$ 30.75 | Leah Vulic |
| 9/3/2021 | 0.35 | Continue researching and drafting motion to dismiss Fourth Amended Complaint and anti-SLAPP motion re: same. | \$ 550.00 | \$ 192.50 | Jeff Rosenfeld |
| 9/6/2021 | 0.4 | Briefly review reply re: emergency motion for order to preserve evidence; review order denying plaintiff's emergency motion; internal conference re: same; review email correspondence with client. | \$ 205.00 | \$ 82.00 | Iyah Turminini |
| 9/15/2021 | 0.25 | Continue researching and drafting motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 137.50 | Jeff Rosenfeld |
| 9/16/2021 | 0.3 | Continue researching and drafting motion to dismiss/anti-SLAPP motion re: fourth amended complaint. | \$ 550.00 | \$ 165.00 | Jeff Rosenfeld |
| 9/17/2021 | 0.55 | Continue researching and drafting motion to dismiss/anti-SLAPP motion re: fourth amended complaint. | \$ 550.00 | \$ 302.50 | Jeff Rosenfeld |
| 9/21/2021 | 2.75 | Continue researching and drafting motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 1,512.50 | Jeff Rosenfeld |
| 9/22/2021 | 0.7 | Continue and researching motion to dismiss/anti-SLAPP motion to fourth amended complaint; review draft stipulation re: briefing schedule. | \$ 550.00 | \$ 385.00 | Jeff Rosenfeld |
| 9/23/2021 | 1.9 | Continue researching and drafting motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 1,045.00 | Jeff Rosenfeld |
| 9/24/2021 | 2.25 | Continue to research and draft motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 1,237.50 | Jeff Rosenfeld |
| 9/27/2021 | 0.1 | Continue researching and drafting motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld |
| 9/28/2021 | 1.25 | Continue researching and drafting motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 687.50 | Jeff Rosenfeld |
| 9/29/2021 | 1.5 | Continue researching and drafting motion to dismiss/anti-SLAPP motion to fourth amended complaint. | \$ 550.00 | \$ 825.00 | Jeff Rosenfeld |
| 10/1/2021 | 0.05 | Continue reviewing and revising motion to dismiss/anti-SLAPP motion to fourth amended complaint; internal communications re: same. | \$ 550.00 | \$ 27.50 | Jeff Rosenfeld |
| 10/5/2021 | 0.1 | Process and route order denying request to adjust briefing schedule into document management system. | \$ 295.00 | \$ 29.50 | Leah Vulic |

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| 10/13/2021 | Review correspondence from plaintiff; internal communications re: 0.4 same. | \$ 550.00 | \$ 220.00 | Jeff Rosenfeld |
| 10/20/2021 | Internal conference re: plaintiff's motion for leave to file supplemental complaint; review plaintiff's motion, corresponding declaration, and proposed order; internal conference re: same; review 0.1 case calendar and upcoming case deadlines. | \$ 205.00 | \$ 20.50 | Iyah Turminini |
| 10/20/2021 | 1.05 Review status of related defamation action. | \$ 550.00 | \$ 577.50 | Jeff Rosenfeld |
| 10/21/2021 | Review plaintiff's motion to supplement complaint; brief research re: subsequent news coverage of case and plaintiff; conference with 0.3 counsel for Musk/Tesla re: plaintiff's motion; research re: same. | \$ 550.00 | \$ 165.00 | Jeff Rosenfeld |
| 10/21/2021 | Process and route defendant's motion to supplement complaint into document management system; update calendar re: filing of and 0.1 hearing on same; review same. | \$ 295.00 | \$ 29.50 | Leah Vulic |
| 10/22/2021 | 2.7 Review client correspondence. | \$ 550.00 | \$ 1,485.00 | Jeff Rosenfeld |
| 10/25/2021 | Begin researching and drafting opposition to plaintiff's motion to supplement; continue researching and drafting motion to dismiss 0.25 fourth amended complaint. | \$ 550.00 | \$ 137.50 | Jeff Rosenfeld |
| 10/26/2021 | Internal conference re: order on plaintiff's motion for leave to file supplemental complaint; review order denying plaintiff's motion for leave to file supplemental complaint; internal conference re: same; 1.25 review case calendar and upcoming case deadlines. | \$ 205.00 | \$ 256.25 | Iyah Turminini |
| 10/26/2021 | Continue researching and drafting motion to dismiss fourth amended 0.05 complaint. | \$ 550.00 | \$ 27.50 | Jeff Rosenfeld |
| 10/26/2021 | Process and route order denying plaintiff's motion for leave to file 0.55 supplemental complaint into document management system. | \$ 295.00 | \$ 162.25 | Leah Vulic |
| 10/28/2021 | Continue researching and drafting motion to dismiss fourth amended 0.25 complaint; internal communications re: same. | \$ 550.00 | \$ 137.50 | Jeff Rosenfeld |
| 10/28/2021 | 0.05 Review and edit motion to dismiss. | \$ 650.00 | \$ 32.50 | Karl Kronenberger |
| 10/29/2021 | 0.2 Review case calendar. | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld |
| 11/3/2021 | Further research and revise motion to dismiss fourth amended 0.8 complaint. | \$ 550.00 | \$ 440.00 | Jeff Rosenfeld |
| 11/4/2021 | Prepare final version of motion to dismiss fourth amended complaint; 0.3 communicate with other defense counsel re: scheduling hearing date. | \$ 550.00 | \$ 165.00 | Jeff Rosenfeld |
| 11/8/2021 | Internal conference re: hearing dates for motion to dismiss fourth amended complaint; review email correspondence with co-counsel re: same; review case calendar and upcoming deadlines; internal 1.55 conference re: same. | \$ 205.00 | \$ 317.75 | Iyah Turminini |
| 11/8/2021 | Internal conference re: motion to dismiss fourth amended complaint; 0.6 review and revise same. | \$ 550.00 | \$ 330.00 | Jeff Rosenfeld |
| 11/8/2021 | Internal conference re: motion to dismiss in light of augmented 0.25 copyright pleading; review same. | \$ 435.00 | \$ 108.75 | Kate Hollist |
| 11/9/2021 | 0.55 Review motion to dismiss. | \$ 295.00 | \$ 162.25 | Leah Vulic |
| 11/10/2021 | 0.55 Review and edit motion to dismiss; internal conference re: same. | \$ 650.00 | \$ 357.50 | Karl Kronenberger |
| 11/10/2021 | Review motion to dismiss; internal conference re: edits and finalizing 0.15 same. | \$ 435.00 | \$ 65.25 | Kate Hollist |
| 11/10/2021 | 0.35 Internal conferences with attorneys re: motion to dismiss. | \$ 295.00 | \$ 103.25 | Leah Vulic |
| 11/11/2021 | Internal conference re: motion to dismiss fourth amended complaint; briefly review notice of motion and motion to dismiss and proposed 2.7 order; assist with filing as necessary. | \$ 205.00 | \$ 553.50 | Iyah Turminini |
| 11/11/2021 | Proofread and cite checked brief; drafted proposed order; created 1.9 TOC and TOA | \$ 205.00 | \$ 389.50 | Jasper Eagleton |

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| | | Review and revise tables of contents and authorities, motion, proposed order; finalize and electronically file same; dispatch Word version to court; dispatch chambers copies re: same; multiple internal | | | | |
| 11/11/2021 | 0.35 | conferences with attorneys re: filing of motion to dismiss. Internal conference re: clerk's notice and amended notice resetting deadlines; review notice; briefly Tesla defendants' motion to dismiss fourth amended complaint and accompanying documents, including declaration of A. Reddy, proposed order, and request for judicial | \$ 295.00 | \$ 103.25 | Leah Vulic | |
| 11/12/2021 | 0.5 | notice. | \$ 205.00 | \$ 102.50 | Iyah Turminini | |
| 11/12/2021 | 0.05 | Process and route Tesla defendants' motion to dismiss and supporting documents into document management system; update calendar re: filing of and hearing on same; process and route notices of deadlines into document management system. | \$ 295.00 | \$ 14.75 | Leah Vulic | |
| 11/29/2021 | 0.45 | Review case calendar; review Tesla's motion to dismiss; internal conference re: same. | \$ 550.00 | \$ 247.50 | Jeff Rosenfeld | |
| 12/9/2021 | 0.75 | Internal conference re: opposition filed by plaintiff in response to defendants' motion to dismiss fourth amended complaint, request for judicial notice, and supporting declaration; briefly review opposition; internal conference re: case deadlines and strategy. | \$ 205.00 | \$ 153.75 | Iyah Turminini | |
| 12/14/2021 | 0.7 | Review opposition to motion to dismiss; internal conference re: same. | \$ 550.00 | \$ 385.00 | Jeff Rosenfeld | |
| 12/14/2021 | 2.55 | Read Plaintiff's opposition to Defendants' motions to dismiss; internal conference re: same. | \$ 435.00 | \$ 1,109.25 | Kate Hollist | |
| 12/15/2021 | 2.4 | Review opposition to motion to dismiss fourth amended complaint; begin legal research re: same. | \$ 550.00 | \$ 1,320.00 | Jeff Rosenfeld | |
| 12/15/2021 | 0.45 | Begin research re: DMCA misrepresentations (outside 9th Circuit) and effect of good faith motive on argument of bad faith. | \$ 435.00 | \$ 195.75 | Kate Hollist | |
| 12/15/2021 | 2.75 | Process and route plaintiff's oppositions to motions to dismiss fourth amended complaint and supporting documents into document management system. | \$ 295.00 | \$ 811.25 | Leah Vulic | |
| 12/16/2021 | 0.85 | Continue researching and drafting reply in support of motion to dismiss fourth amended complaint; internal conference re: same. | \$ 550.00 | \$ 467.50 | Jeff Rosenfeld | |
| 12/16/2021 | 0.1 | Internal conference re: reply to motion to dismiss; continue research re: same. | \$ 435.00 | \$ 43.50 | Kate Hollist | |
| 12/16/2021 | 0.2 | Process and route Tesla defendants' withdrawal and substitution of counsel into document management system. | \$ 295.00 | \$ 59.00 | Leah Vulic | |
| 12/17/2021 | 1.1 | Continue researching and drafting reply to motion to dismiss fourth amended complaint. | \$ 550.00 | \$ 605.00 | Jeff Rosenfeld | |
| 12/17/2021 | 1.7 | Begin drafting inserts for reply in support of motion to dismiss. | \$ 435.00 | \$ 739.50 | Kate Hollist | |
| 12/20/2021 | 1.8 | Continue researching and drafting reply to motion to dismiss fourth amended complaint. | \$ 550.00 | \$ 990.00 | Jeff Rosenfeld | |
| 12/20/2021 | 0.65 | Finalize inserts for reply in support of motion to dismiss; internal conference re: same. | \$ 435.00 | \$ 282.75 | Kate Hollist | |
| 12/20/2021 | 0.25 | Review and revise reply in support of motion to dismiss. | \$ 295.00 | \$ 73.75 | Leah Vulic | |
| 12/21/2021 | 1.5 | Internal conference re: upcoming reply in support of motion to dismiss fourth amended complaint. | \$ 205.00 | \$ 307.50 | Iyah Turminini | |
| 12/21/2021 | 0.3 | Continue researching and drafting reply to motion to dismiss fourth amended complaint; internal communications re: same. | \$ 550.00 | \$ 165.00 | Jeff Rosenfeld | |

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| | Review court's standing orders re: chambers copies; internal conferences re: same and reply; process and route plaintiff's | | | | |
| 12/21/2021 | 1.75 statement of recent decision into document management system. | \$ 295.00 | \$ 516.25 | Leah Vulic | |
| | Internal conference re: reply in support of motion to dismiss fourth amended complaint; review, finalize, and file reply; process and route file-stamped documents into internal document management system; arrange for transmission of chambers copies through OneLegal; | | | | |
| 12/22/2021 | 0 review case calendar and update as necessary. | \$ 205.00 | \$ - | Iyah Turminini | |
| | Review and revise reply to motion to dismiss fourth amended | | | | |
| 12/22/2021 | 0.15 complaint; internal communications re: same. | \$ 550.00 | \$ 82.50 | Jeff Rosenfeld | |
| 12/22/2021 | 0.35 Review plaintiff's statement of recent decision. | \$ 295.00 | \$ 103.25 | Leah Vulic | |
| 12/27/2021 | 0.25 Review Tesla defendants' reply in support of motion to dismiss. | \$ 295.00 | \$ 73.75 | Leah Vulic | |
| 12/28/2021 | 0.05 Review plaintiff's statement of recent decision and decision. | \$ 295.00 | \$ 14.75 | Leah Vulic | |
| 12/29/2021 | 0.1 Briefly review case updates and news coverage. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld | |
| | File order vacating the hearings on the motions to dismiss and update | | | | |
| 1/5/2022 | 0.05 calendar | \$ 205.00 | \$ 10.25 | Jasper Eagleton | |
| 1/7/2022 | 0.2 Review correspondence re: donation to legal defense. | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld | |
| 1/12/2022 | 0.3 Review file re: status of matter and hearing. | \$ 295.00 | \$ 88.50 | Leah Vulic | |
| | Review plaintiff's request for judicial notice and email | | | | |
| 1/18/2022 | 0.1 correspondence. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld | |
| | Process and route plaintiff's request for judicial notice into document | | | | |
| 1/18/2022 | 0.15 management system. | \$ 295.00 | \$ 44.25 | Leah Vulic | |
| | Briefly review development in 512(f) case law; internal | | | | |
| 3/7/2022 | 0.1 communication re: same. | \$ 550.00 | \$ 55.00 | Jeff Rosenfeld | |
| 3/30/2022 | 0.05 Review correspondence from plaintiff. | \$ 550.00 | \$ 27.50 | Jeff Rosenfeld | |
| 4/7/2022 | 0.35 Review correspondence from opposing counsel. | \$ 550.00 | \$ 192.50 | Jeff Rosenfeld | |
| 4/7/2022 | 0.25 Review plaintiff's motion to lift discovery stay. | \$ 295.00 | \$ 73.75 | Leah Vulic | |
| | Process and route incoming motion to lift stay into document | | | | |
| 4/8/2022 | 0.15 management system and calendar related deadlines | \$ 205.00 | \$ 30.75 | Jasper Eagleton | |
| 4/8/2022 | 0.15 Briefly review plaintiff's motion to lift stay of discovery. | \$ 550.00 | \$ 82.50 | Jeff Rosenfeld | |
| 4/8/2022 | 0.1 Review calendar re: deadlines related to plaintiff's motion to lift stay. | \$ 295.00 | \$ 29.50 | Leah Vulic | |
| | Process and route incoming statement of recent decision into | | | | |
| 4/14/2022 | 0.1 document management system and check for related deadlines | \$ 205.00 | \$ 20.50 | Jasper Eagleton | |
| 4/14/2022 | 0.2 Review plaintiff's statement of recent decision. | \$ 550.00 | \$ 110.00 | Jeff Rosenfeld | |
| 4/14/2022 | 0.95 Briefly review plaintiff's statement of recent decision. | \$ 295.00 | \$ 280.25 | Leah Vulic | |
| | Internal conference re: plaintiff's motion to lift automatic discovery stay; review local rules and judge's standing orders for any requirements re: joinders to oppositions; draft joinder to opposition of Tesla defendants; review email correspondence re: joinder | | | | |
| 4/21/2022 | 0.2 procedures. | \$ 205.00 | \$ 41.00 | Iyah Turminini | |
| | Review opposition to discovery motion filed by Tesla and review draft | | | | |
| 4/21/2022 | 0.7 joinder; internal conference re: same. | \$ 650.00 | \$ 455.00 | Karl Kronenberger | |
| | Internal conference with attorneys re: filing notice of joinder; revise, finalize, and electronically file notice of joinder (with technical | | | | |
| 4/21/2022 | 0.2 difficulties). | \$ 295.00 | \$ 59.00 | Leah Vulic | |
| | Process and route incoming reply in support of motion to partially lift stay into document management system and check for related | | | | |
| 4/27/2022 | 0.05 deadlines | \$ 205.00 | \$ 10.25 | Jasper Eagleton | |
| 4/28/2022 | 0.5 Review notice of recent decision. | \$ 550.00 | \$ 275.00 | Jeff Rosenfeld | |

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| | | Review plaintiff's reply in support of motion for partial lift of discovery stay; process and route order denying motion for partial lift of discovery stay into document management system; update calendar re: same; process and route statement of recent decision | | | | |
| 4/28/2022 | 0.05 | into document management system; briefly review same. | \$ 295.00 | \$ | 14.75 | Leah Vulic |
| | | Review plaintiff's request for judicial notice; briefly review news | | | | |
| 5/4/2022 | 0.2 | coverage of suit. | \$ 550.00 | \$ | 110.00 | Jeff Rosenfeld |
| | | Process and route plaintiff's request for judicial notice into document | | | | |
| 5/4/2022 | 0.1 | management system; briefly review same. | \$ 295.00 | \$ | 29.50 | Leah Vulic |
| | | Process and route incoming plaintiff's amended notice of recent decision into document management system and check for related | | | | |
| 5/11/2022 | 0.3 | deadlines | \$ 205.00 | \$ | 61.50 | Jasper Eagleton |
| | | Process and route incoming second order granting motion to dismiss fourth amended complaint into document management system and | | | | |
| 5/19/2022 | 0.1 | calendar related deadlines. | \$ 205.00 | \$ | 20.50 | Jasper Eagleton |
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| 5/19/2022 | 0.2 | Review order on motion to dismiss; internal conference re: same. | \$ 550.00 | \$ | 110.00 | Jeff Rosenfeld |
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| 5/19/2022 | 0.15 | Review order on motion to dismiss; correspond with client re: [REDACTED] | \$ 650.00 | \$ | 97.50 | Karl Kronenberger |
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| 5/19/2022 | 0.4 | Review order on motion to dismiss; internal conferences re: same. | \$ 435.00 | \$ | 174.00 | Kate Hollist |
| | | Process and route order granting motions to dismiss into document management system; review same; internal conference with | | | | |
| 5/19/2022 | 0.3 | paralegals re: calendaring same. | \$ 295.00 | \$ | 88.50 | Leah Vulic |